

EXHIBIT H

Atkinson-Baker, Inc.
www.depo.com

1

2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

3

-----X

4

EASTERN PROFIT CORPORATION LIMITED,

5

Plaintiff/Counterclaim Defendant,

6

-against-

Case No.
18-cv-2185 (JGK)

7

STRATEGIC VISION US, LLC,

8

Defendants/Counterclaim Plaintiff,

9

-against-

10

GUO WENGUI a/k/a MILES KWOK,

11

Counterclaim Defendant.

12

-----X

13

14

15

VIDEOTAPED DEPOSITION OF

16

YVETTE WANG

17

New York, New York

18

October 30, 2019

19

20

21

ATKINSON-BAKER, INC.

22

COURT REPORTERS

23

(800) 288-3376

Www.depo.com

24

REPORTED BY: TERRI FUDENS

25

FILE NO: ADOABD6A

Atkinson-Baker, Inc.
www.depo.com

<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK</div> <div>-----X</div> <div>EASTERN PROFIT CORPORATION LIMITED, Plaintiff/Counterclaim Defendant,</div> <div>V.</div> <div>STRATEGIC VISION US, LLC, Defendants/Counterclaim Plaintiff.</div> <div>-----X</div> <div>Videotaped deposition of YVETTE WANG, a 30(b)(6) witness taken on behalf of Eastern Profit Corporation Ltd., the Plaintiff-Counterclaim Defendant herein, taken by the Defendant-Counterclaim Plaintiff pursuant to Court Order held at 620 Eighth Avenue, New York, New York, commencing at 9:55 A.M., Wednesday, October 30, 2019, before Terri Fudens, a Stenotype Reporter and Notary Public of the State of New York.</div> <div>Page 2</div>	<div>APPEARANCES CONTINUED:</div> <div>GOLDEN SPRING (NEW YORK) LTD. In-House Counsel for Golden Spring 162 E. 64th Street New York, New York 10065 917.941.9698 BY: DANIEL PODHASKIE, ESQ.</div> <div>* * * *</div> <div>Page 4</div>
<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>APPEARANCES:</div> <div>HODGSON RUSS LLP Attorneys for Non-Party Golden Spring (New York) LTD. 605 Third Avenue Suite 2300 New York, New York 10158</div> <div>BY: ERIN TESKE, ESQ.</div> <div>GRAVES GARETT LLC Attorneys for Defendant/Counterclaim Plaintiff - Strategic Vision US LLC 1100 Main Street, Suite 2700 Kansas City, Missouri 64105 816.2563181</div> <div>BY: EDWARD D. GREIM, ESQ. edgreim@gravesgarrett.com</div> <div>JENNIFER DONNELLI, ESQ. jdonnelli@gravesgarrett.com</div> <div>PEPPER HAMILTON LLP Attorneys for Plaintiff/Counterclaim Defendant - Eastern Profit Corporation, Ltd. 1313 North Market Street Suite 5100 Wilmington, Delaware 19801</div> <div>BY: JOANNA CLINE, ESQ.</div> <div>Page 3</div>	<div>INDEX</div> <div>WITNESS: EXAMINATION BY: PAGES:</div> <div>Yvette Wang Mr. Greim 15</div> <div>EXHIBITS</div> <div>EXHIBIT: DESCRIPTION: PAGES:</div> <div>Wang 30 Notice of Deposition 18</div> <div>Wang 31 A Loan Agreement Bates stamped Eastern-000278 to 280 97</div> <div>EXHIBITS MARKED BUT PREVIOUSLY PRODUCED</div> <div>EXHIBIT: DESCRIPTION: PAGES:</div> <div>Guo 2 Limited Power of Attorney Bates stamped Eastern-000276 and 277 41</div> <div>Wang 2 Research Agreement dated December 29, 20107 Bates stamped Eastern-000005 to Eastern 000009 140</div> <div>Wang 4 A document titled Research Agreement dated January 1, 2018 and Bates stamped Eastern-000001 to Eastern-000004 162</div> <div>Wang 3 A document titled Plaintiff Eastern Profit Corporation Limited's Responses and Objections to Defendant Strategic Vision US, LLC's First Set of Interrogatories. 172</div> <div>Page 5</div>

2 (Pages 2 to 5)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1</p> <p>2 EXHIBITS MARKED BUT PREVIOUSLY PRODUCED</p> <p>3 EXHIBIT: DESCRIPTION: PAGES:</p> <p>4 Wang 12 A Name List 186</p> <p>5</p> <p>6 *** EXHIBITS RETAINED BY COUNSEL ***</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 6</p>	<p>1</p> <p>2</p> <p>3 establish what knowledge each entity</p> <p>4 had, because I think they're probably</p> <p>5 coterminous, and then carve out --</p> <p>6 you know, I think I will quickly</p> <p>7 identify any areas where they don't</p> <p>8 have the same knowledge, that I would</p> <p>9 knock those out.</p> <p>10 But otherwise I would ask the</p> <p>11 great majority of my questions of the</p> <p>12 witness on behalf of both entities</p> <p>13 and make that clear on the record.</p> <p>14 That was the whole point of saving</p> <p>15 time to do the same witness in the</p> <p>16 same day. I think my opponents</p> <p>17 object. I'll let them go.</p> <p>18 ERIN TESKE: Your Honor, these</p> <p>19 are two different depositions.</p> <p>20 I'm sorry. This is Erin Teske</p> <p>21 on behalf of Golden Spring, New York</p> <p>22 today.</p> <p>23 And these are two different</p> <p>24 entirely depositions. And despite</p> <p>25 what Mr. Greim believes in his heart,</p> <p>the information that the two entities</p> <p style="text-align: right;">Page 8</p>
<p>1</p> <p>2 MR. GREIM: We are just on the</p> <p>3 phone with Judge Freeman on the</p> <p>4 Strategic Vision/Eastern Profit case.</p> <p>5 JUDGE FREEMAN: This is Judge</p> <p>6 Freeman.</p> <p>7 MR. GREIM: Judge Freeman, we're</p> <p>8 back in the conference room, and now</p> <p>9 we have -- now we're on the record.</p> <p>10 JUDGE FREEMAN: Okay. You've</p> <p>11 given your appearances to the court</p> <p>12 reporter?</p> <p>13 MR. GREIM: Yes, we have.</p> <p>14 JUDGE FREEMAN: All right. So</p> <p>15 who has an issue before you even</p> <p>16 started?</p> <p>17 MR. GREIM: Right. Well, your</p> <p>18 Honor, we were going to start 15</p> <p>19 minutes early. And basically the</p> <p>20 question is whether I must declare</p> <p>21 that I am starting with one of the</p> <p>22 two entities, finish all questions</p> <p>23 for that entity and move on to</p> <p>24 other one, or whether I can first</p> <p>25 establish -- my plan was to first</p> <p style="text-align: right;">Page 7</p>	<p>1</p> <p>2 have is not the same, and it is</p> <p>3 different. And it's very confusing</p> <p>4 for the witness who is wearing two</p> <p>5 hats to try to decipher whether</p> <p>6 Mr. Greim is asking questions in</p> <p>7 which capacity if it's not made clear</p> <p>8 that this is the deposition of</p> <p>9 Eastern, and this is the deposition</p> <p>10 of GSNY.</p> <p>11 These should be being held on</p> <p>12 different days, plus for the fact</p> <p>13 that we're accommodating Mr. Greim's</p> <p>14 request.</p> <p>15 MS. CLINE: Your Honor, this is</p> <p>16 Joanna Cline for Eastern Profit. I</p> <p>17 concur with Miss Teske.</p> <p>18 From our perspective, Mr. Greim</p> <p>19 is again trying to argue the alterego</p> <p>20 with the account that has been</p> <p>21 dismissed, and conflate the two</p> <p>22 entities.</p> <p>23 And Miss Wang is here to testify</p> <p>24 on behalf of two separate entities,</p> <p>25 and in our view it should be two</p> <p style="text-align: right;">Page 9</p>

3 (Pages 6 to 9)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>separate depositions.</p> <p>JUDGE FREEMAN: All right. Hold on a second. I had issued an order, which I assume you saw, where I said that you can have another seven hours with this witness, but I was assuming that both depositions could be completed within that time.</p> <p>If the plaintiff and Golden Spring really want these depositions to be separate so that you might have the exact same questions asked twice, I'm not going to adhere to that aspect of my ruling, and I'm not going to limit Mr. Greim to one day in order to complete both depositions of both witnesses.</p> <p>I will require Mr. Greim to conduct them separately. And he may be very repetitive and be using a lot more of this witness' time. But you will have more clarity of the transcript, if that's what you want, on the plaintiff's and non-party</p> <p style="text-align: right;">Page 10</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>that to Mr. Greim. I will tell Mr. Greim to be reasonably tailored, stay focused on the topics that I permitted and the ones that were agreed by the parties.</p> <p>But the whole concept of economies of scale, if you will, or whatever you want to call it, efficiency, was that this was one witness who in some cases could probably be speaking for both entities in answering certain questions.</p> <p>You can probably cover it all within seven hours. I think that although one was a continuation, the other one was not. And so the one that was not is entitled to seven hours if he wants to use them.</p> <p>All right?</p> <p>MR. GREIM: Thank you, Your Honor.</p> <p>MS. CLINE: Thank you, Your Honor.</p> <p style="text-align: right;">Page 12</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>side. But the witness may have to come back for more than one day.</p> <p>MR. GREIM: Your Honor, I'll do it either way. I felt very clear that we were going to do it my way, so to speak. But we'll be back again for some other people, and we can do one today and do the other later. I'll just leave it right now to my opponents.</p> <p>JUDGE FREEMAN: I'll leave the call also to plaintiff and the non-party. If you really want to be separated, that's fine, but I'm not going to limit Mr. Greim then to one day. The concept was that there would be a lot that would be overlapping.</p> <p>ERIN TESKE: Your Honor, I think the scope of the deposition for GSNY is such that it doesn't -- it shouldn't require another day.</p> <p>JUDGE FREEMAN: But it may and it may not, and I'm going to leave</p> <p style="text-align: right;">Page 11</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>MS. TESKE: Thank you, your Honor.</p> <p>JUDGE FREEMAN: You're welcome.</p> <p>MS. CLINE: Let's go off the record.</p> <p>(At this time, a brief recess was taken.)</p> <p>THE VIDEOGRAPHER: Good morning. I am Thomas Del Vecchio, your videographer. I represent Atkinson-Baker, Inc. in Glendale, California.</p> <p>I am not financially interested in this action, nor am I a relative or employee of any attorney or any of the parties.</p> <p>Today's date is Wednesday, October 30, 2019. The time is 10:15 a.m. This deposition is taking place at the office of Pepper Hamilton, LLP, 620 Eighth Avenue, New York, New York.</p> <p>The case number is 18-CV-2185 entitled Eastern Profit Corporation</p> <p style="text-align: right;">Page 13</p>

4 (Pages 10 to 13)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 Limited, plaintiff/counterclaim 2 defendant, versus Strategic Vision 3 US, LLC, defendant/counterclaim 4 plaintiff. 5 The deponent today is 6 Miss Yvette Wang. 7 This deposition is being taken 8 on behalf of defendant/counterclaim 9 plaintiff. 10 Your court reporter is Terri 11 Fudens from Atkinson-Baker. 12 Will counsel now please 13 introduce themselves. After counsel 14 have introduced themselves, the 15 witness may be sworn in by the 16 reporter. 17 MR. GREIM: This is Eddie Greim 18 and Jennifer Donnelly, counsel for 19 Defendant/Counterclaimant Strategic 20 Vision US, LLC. 21 MS. CLINE: Joanna Cline, Pepper 22 Hamilton, counsel for Eastern Profit 23 and the witness. 24 MR. GREIM: Could the record 25</p> <p style="text-align: right;">Page 14</p>	<p>1 YVETTE WANG 2 162 East 64th Street, New York, New York, 10065. 3 Q And is that your residence, or is 4 that the address of Golden Spring New York? 5 A This is the address of Golden Spring 6 New York. 7 Q What is your residential address? 8 MS. CLINE: Objection. I'm not 9 sure you need her residential 10 address. If you need to get in touch 11 with the witness, you can do so 12 through our law firm. 13 MR. GREIM: Well, counsel, in 14 case we need to subpoena her at 15 trial. 16 MS. CLINE: She's here in her 17 corporate capacity, not her 18 individual capacity. 19 MR. GREIM: So the witness 20 declined to give her residential 21 address? 22 A Correct. 23 Q You understand that you're here as 24 the representative of Eastern Profit, the 25 plaintiff/counterclaimant in this case --</p> <p style="text-align: right;">Page 16</p>
<p>1 YVETTE WANG 2 reflect that also sitting in the room 3 with us today are Erin Teske, counsel 4 for Golden Spring New York Ltd., as 5 well as Daniel Podhaskie, who I 6 understand to be general counsel of 7 Golden Spring New York, Ltd. and is 8 here. 9 Mr. Podhaskie, could you state 10 your purpose for being here? 11 MR. PODHASKIE: Corporate 12 representative of Eastern Profit. 13 MR. GREIM: By virtue of the 14 Power of Attorney? 15 MR. PODHASKIE: Correct. 16 Y V E T T E W A N G, a 30(b)(6) witness 17 herein, having been first duly sworn 18 by Terri Fudens, a Notary Public of 19 the State of New York, was examined 20 and testified as follows: 21 EXAMINATION BY 22 MR. GREIM: 23 Q Miss Wang, could you give us your 24 legal name and your address, please? 25 A Legal name is Yvette Wang. Address,</p> <p style="text-align: right;">Page 15</p>	<p>1 YVETTE WANG 2 counterclaim defendant in this case? 3 A Correct. 4 Q All right. And you've given a prior 5 deposition as the corporate representative of 6 Eastern Profit; correct? 7 A Can you repeat again your question? 8 Q Sure. You've given a prior 9 deposition as the corporate representative of 10 Eastern Profit; correct? 11 A Correct. 12 Q And that is pursuant to a Notice of 13 Deposition; correct? 14 A Sorry. What's your question? 15 Q That was pursuant to a Notice of 16 Deposition? 17 A What do you mean pursuit of? Can you 18 explain? 19 Q Someone gave you a Notice of 20 Deposition and it listed topics. Do you recall 21 that? 22 This is for your first deposition. 23 A Yes. 24 Q And then you prepared yourself to 25 answer on those topics; right?</p> <p style="text-align: right;">Page 17</p>

5 (Pages 14 to 17)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q And have you similarly prepared</p> <p>4 yourself to answer questions on topics for today?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 You can go ahead and answer.</p> <p>7 A I believe I prepared for today.</p> <p>8 Q Now the topics on which you are to</p> <p>9 testify are listed in a Notice of Deposition which</p> <p>10 has been modified by a court order and by the</p> <p>11 agreement of the parties.</p> <p>12 (Wang Exhibit 30, Notice of</p> <p>13 Deposition previously marked for</p> <p>14 Identification as of this date.)</p> <p>15 Q So I'm going to hand you -- here we</p> <p>16 go. I'm going to hand you what we've marked as</p> <p>17 Exhibit 30, and I'm going to ask you to pass one</p> <p>18 over to your attorney.</p> <p>19 From now on I'm going to give you two</p> <p>20 copies of everything. One I want you to keep in</p> <p>21 front of you that has the actual number on it, and</p> <p>22 then just hand the other one over to your</p> <p>23 attorney. Okay?</p> <p>24 A I cannot. One you have an exhibit</p> <p>25 sticker. Another one you do not have. What do</p> <p style="text-align: right;">Page 18</p>	<p>1 YVETTE WANG</p> <p>2 Q Your first deposition was January 31,</p> <p>3 2019.</p> <p>4 A It's about 10 months ago; right?</p> <p>5 Q Almost.</p> <p>6 A Okay. Thank you for reminder.</p> <p>7 Q Okay. And you prepared today for a</p> <p>8 narrower set of topics than those seven; is that</p> <p>9 right?</p> <p>10 MS. CLINE: Objection to form.</p> <p>11 A Can you repeat again?</p> <p>12 Q You prepared today for a narrower set</p> <p>13 of topics than those seven; correct?</p> <p>14 A You mean this seven topics? They</p> <p>15 were the topics in my first deposition --</p> <p>16 Q Right.</p> <p>17 A -- about 10 months ago.</p> <p>18 Q Right.</p> <p>19 A And you're asking me did I prepare</p> <p>20 less than seven topics for today. Is that your</p> <p>21 question?</p> <p>22 Q Sure.</p> <p>23 A The answer is yes.</p> <p>24 Q Okay. Now before your last</p> <p>25 deposition, you had not spoken with a</p> <p style="text-align: right;">Page 20</p>
<p>1 YVETTE WANG</p> <p>2 you want to do with this?</p> <p>3 Q I want you to keep the exhibit</p> <p>4 sticker one in front of you.</p> <p>5 A Okay.</p> <p>6 Q And I'm going to hand you -- I want</p> <p>7 you to hand the other one to your attorney.</p> <p>8 A This one; right?</p> <p>9 Q Yes. It just occurred to me that</p> <p>10 that will be the easier way to do this.</p> <p>11 Now if you look on the third page of</p> <p>12 this, do you see a listing of topics?</p> <p>13 A Yes. There are topics here.</p> <p>14 Q Okay. Listen to my question</p> <p>15 carefully here.</p> <p>16 These are the seven topics that you</p> <p>17 originally prepared for on your first deposition;</p> <p>18 isn't that right?</p> <p>19 MS. CLINE: I'm going to object.</p> <p>20 Her original deposition was a year</p> <p>21 ago or January of this year. Excuse</p> <p>22 me. This isn't really a memory test,</p> <p>23 so I wish we could just move along</p> <p>24 and get to the substance.</p> <p>25 A When was my first deposition?</p> <p style="text-align: right;">Page 19</p>	<p>1 YVETTE WANG</p> <p>2 representative of Eastern Profit; correct?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A What's the question?</p> <p>5 Q Before your last deposition, you had</p> <p>6 not spoken with a representative of Eastern</p> <p>7 Profit; correct?</p> <p>8 A Before my last deposition? I don't</p> <p>9 remember that. 10 months ago is a long time.</p> <p>10 MS. CLINE: She's going to</p> <p>11 object to the line of questioning.</p> <p>12 The judge has already given you the</p> <p>13 opportunity to take additional time</p> <p>14 with this witness.</p> <p>15 I'm not sure why you need to</p> <p>16 establish the extent to which she was</p> <p>17 prepared the last time. Let's just</p> <p>18 move to the substance.</p> <p>19 MR. GREIM: Please.</p> <p>20 Q Who have you spoken with to prepare</p> <p>21 for today?</p> <p>22 A My lawyers.</p> <p>23 Q Who are your lawyers?</p> <p>24 A Joanna right here.</p> <p>25 Q Who else?</p> <p style="text-align: right;">Page 21</p>

6 (Pages 18 to 21)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A Just my lawyer, I believe.</p> <p>3 Q So only with Miss Cline?</p> <p>4 A Yes.</p> <p>5 Q Now did you speak with any nonlawyers</p> <p>6 in preparation for your testimony today?</p> <p>7 A For today?</p> <p>8 Q Mm-hmm.</p> <p>9 A No, I didn't.</p> <p>10 Q Did you speak with any representative</p> <p>11 of Eastern Profit other than Miss Cline in</p> <p>12 preparation for your deposition today?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A I briefly ask some question.</p> <p>15 Q Okay. Of whom?</p> <p>16 A The director and a representative of</p> <p>17 Eastern Profit.</p> <p>18 Q Okay. Are those two different people</p> <p>19 or the same person?</p> <p>20 A Two different people.</p> <p>21 Q Who is the director of Eastern Profit</p> <p>22 that you spoke with?</p> <p>23 A Mei Guo. M-E-I G-U-O.</p> <p>24 Q Okay. And who is the representative</p> <p>25 that you spoke with?</p> <p style="text-align: right;">Page 22</p>	<p>1 YVETTE WANG</p> <p>2 A A business woman.</p> <p>3 Q She's Guo Wengui's daughter; correct?</p> <p>4 A Correct.</p> <p>5 Q And she is the sole director of</p> <p>6 Eastern Profit; is that correct?</p> <p>7 A Correct.</p> <p>8 Q Why did you -- well, let me ask you</p> <p>9 this.</p> <p>10 Did you speak to her in person or</p> <p>11 over the phone?</p> <p>12 A I don't remember clearly. Should be</p> <p>13 like in person, yeah.</p> <p>14 Q And is it your testimony that you do</p> <p>15 not remember what you spoke to her about?</p> <p>16 A Is there any problem? Like a couple</p> <p>17 of months ago if you ask me specific question, I</p> <p>18 may be able to recall my memory about that</p> <p>19 conversation because we met and we talk a lot. I</p> <p>20 don't know which is the answer you ask.</p> <p>21 Q Okay. So it was a long conversation</p> <p>22 with Mei Guo?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A I don't remember.</p> <p>25 Q I'm trying to understand, you said</p> <p style="text-align: right;">Page 24</p>
<p>1 YVETTE WANG</p> <p>2 A Mr. Han, H-A-N.</p> <p>3 Q Is this Mr. Han Chunguang.</p> <p>4 A Correct.</p> <p>5 Q C-H-U-N-G-U-A-N-G; right?</p> <p>6 A C-H-U-N-G-U-A-N-G, yes.</p> <p>7 Q Does he sometimes go by Hank Han?</p> <p>8 A I don't know his English name.</p> <p>9 You're talking about his English name?</p> <p>10 Q Yes. You never heard him called Hank</p> <p>11 before?</p> <p>12 A I don't know that name.</p> <p>13 Q When did you speak with Mei Guo?</p> <p>14 A I don't remember clearly. Like a</p> <p>15 couple of month ago.</p> <p>16 Q Was it in preparation for this</p> <p>17 deposition?</p> <p>18 A I believe not because this deposition</p> <p>19 was just ordered like a couple of days ago. How I</p> <p>20 can prepare this deposition, it involves like a</p> <p>21 couple of month.</p> <p>22 Q What did you speak with Mei Guo</p> <p>23 about?</p> <p>24 A I don't remember clearly.</p> <p>25 Q Who is she?</p> <p style="text-align: right;">Page 23</p>	<p>1 YVETTE WANG</p> <p>2 you met and you talked a lot. What did you talk</p> <p>3 about?</p> <p>4 A I don't understand your question.</p> <p>5 Q Did you talk a lot with Mei Guo when</p> <p>6 you spoke with her a few months ago?</p> <p>7 A I don't understand your question.</p> <p>8 Q Where were you when you spoke with</p> <p>9 Mei Guo in person a couple of months ago?</p> <p>10 A In New York.</p> <p>11 Q Where in New York?</p> <p>12 A A restaurant.</p> <p>13 Q Okay. Who else was with you?</p> <p>14 A Just myself and her.</p> <p>15 Q Had you met her before?</p> <p>16 A Yes.</p> <p>17 Q Was this a social meeting or a</p> <p>18 business meeting?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A What is your definition? What is</p> <p>21 social meeting? What is business meeting?</p> <p>22 Q What was the purpose of your meeting?</p> <p>23 A I don't understand your question.</p> <p>24 Q Why did you meet with her?</p> <p>25 A To ask her what is about Eastern</p> <p style="text-align: right;">Page 25</p>

7 (Pages 22 to 25)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Profit.</p> <p>3 Q Okay. So the purpose of the meeting</p> <p>4 was to ask her about Eastern Profit?</p> <p>5 A Kind of.</p> <p>6 Q Okay. Well what was the other</p> <p>7 purpose of the meeting?</p> <p>8 A Chat about the Chinese Communist</p> <p>9 Party took more action mainland of China to</p> <p>10 persecute my colleagues or my friends.</p> <p>11 Q Who requested the meeting?</p> <p>12 A Myself.</p> <p>13 Q Why did you want to talk to her about</p> <p>14 the persecution of your colleagues on the</p> <p>15 mainland?</p> <p>16 A Chat. Just chat.</p> <p>17 Q So during this chat, you also talked</p> <p>18 to her about Eastern Profit?</p> <p>19 A Correct.</p> <p>20 Q But at that time, as you said</p> <p>21 earlier, you did not know that this continuation</p> <p>22 deposition would be ordered?</p> <p>23 A What's your question?</p> <p>24 Q But at that time, as you testified</p> <p>25 earlier, you did not know that the continue</p> <p style="text-align: right;">Page 26</p>	<p>1 YVETTE WANG</p> <p>2 Q What was her response?</p> <p>3 A She was upset and she said she didn't</p> <p>4 know anything about this. And she ask me to</p> <p>5 handle everything.</p> <p>6 Q Okay. How did you respond to her</p> <p>7 request?</p> <p>8 A I said -- I don't remember the clear</p> <p>9 precise quote, but I told her okay. I have been</p> <p>10 already dealing with this group of liars, and this</p> <p>11 case, I will handle this for you. You don't need</p> <p>12 to worry because you don't know anything about</p> <p>13 this at all.</p> <p>14 Q How did you know that she didn't know</p> <p>15 anything about this at all?</p> <p>16 A I don't understand your question.</p> <p>17 Q How did you know that Guo Mei did not</p> <p>18 know anything about this at all?</p> <p>19 A Oh. That is my guess because I ask</p> <p>20 her: Did you hear or heard about these two liars,</p> <p>21 French Wallop and Michael Waller? She said I</p> <p>22 don't know.</p> <p>23 Q Was this after Strategic Vision had</p> <p>24 filed its counterclaim in this case?</p> <p>25 A When did you file counterclaim?</p> <p style="text-align: right;">Page 28</p>
<p>1 YVETTE WANG</p> <p>2 deposition would be ordered; did you?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A Should I know by then what will</p> <p>5 happen after like a couple of month? Fair; right?</p> <p>6 Q Right. So the answer is no?</p> <p>7 A Correct.</p> <p>8 Q So why did you want to talk to her</p> <p>9 about Eastern Profit during this restaurant</p> <p>10 meeting?</p> <p>11 A Because Eastern Profit signed a</p> <p>12 Limited Power of Attorney authorize Golden Spring</p> <p>13 to handle this case.</p> <p>14 Q So were you reporting on the progress</p> <p>15 of the case?</p> <p>16 A What do you mean report?</p> <p>17 Q Tell. Were you telling her about the</p> <p>18 progress of the case?</p> <p>19 A I told her.</p> <p>20 Q Okay. And what did you tell her?</p> <p>21 A I told her Eastern Profit was</p> <p>22 cheated. And Eastern Profit right now is in a</p> <p>23 lawsuit. I probably need to know more, know more</p> <p>24 about Eastern Profit so I can help to deal with</p> <p>25 this litigation.</p> <p style="text-align: right;">Page 27</p>	<p>1 YVETTE WANG</p> <p>2 Q July 23rd.</p> <p>3 A Which year?</p> <p>4 Q 2019.</p> <p>5 A Oh. I don't remember that. It's in</p> <p>6 summer, but I don't remember which month. It's</p> <p>7 before you or after you. I don't remember that.</p> <p>8 Q What else did you discuss about</p> <p>9 Eastern Profit?</p> <p>10 A I ask like I remember the general,</p> <p>11 like basic information about Eastern Profit.</p> <p>12 Q What did she tell you?</p> <p>13 A The bank. The first thing she told</p> <p>14 me Eastern Profit bank accounts was frozen in Hong</p> <p>15 Kong.</p> <p>16 Q Okay. What else?</p> <p>17 A Eastern Profit is a Hong Kong</p> <p>18 company.</p> <p>19 Q I think you knew that at your first</p> <p>20 deposition. Do you remember that?</p> <p>21 A I don't remember that.</p> <p>22 Q What else did she tell you?</p> <p>23 A Before the bank accounts like was</p> <p>24 frozen, Eastern -- I don't remember that clearly.</p> <p>25 Kind of she told me Eastern has</p> <p style="text-align: right;">Page 29</p>

8 (Pages 26 to 29)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 office in Hong Kong. And Eastern Profit, they</p> <p>3 have assets, yeah, because I was asking her about</p> <p>4 the general, like basic information about this</p> <p>5 company.</p> <p>6 Q Right.</p> <p>7 A So she told me these things.</p> <p>8 Q Do you remember anything else she</p> <p>9 told you?</p> <p>10 MS. CLINE: I'm just going to</p> <p>11 object to the line of inquiry. There</p> <p>12 is a narrow set of topics on which we</p> <p>13 agreed and the court issued an order</p> <p>14 that don't include, for example,</p> <p>15 whether or not Eastern Profit has any</p> <p>16 independent financial identities.</p> <p>17 I'm not sure why we're delving</p> <p>18 into every piece of every</p> <p>19 conversation she had with Guo Mei,</p> <p>20 and I think we should move on and get</p> <p>21 to the substance of the deposition as</p> <p>22 agreed upon.</p> <p>23 MR. GREIM: It's the only</p> <p>24 natural person we've heard about, so</p> <p>25 we're finally getting some relevant</p> <p style="text-align: right;">Page 30</p>	<p>1 YVETTE WANG</p> <p>2 Q So did she tell you during this</p> <p>3 discussion that Hank, as you said, or Han Chung</p> <p>4 Uang, was still running Eastern Profit at that</p> <p>5 time?</p> <p>6 A In my understanding, yes.</p> <p>7 Q Did she tell you what he does for</p> <p>8 Eastern Profit?</p> <p>9 A Not too much, because she expressed</p> <p>10 like as a normal business if the bank account was</p> <p>11 frozen or is frozen, what kind of business you can</p> <p>12 continue.</p> <p>13 But she emphasized Mr. Han as still</p> <p>14 helping her to like manage the cars and -- yeah,</p> <p>15 the cars. Basically the assets of Eastern Profit.</p> <p>16 Q Did you say cars as in automobiles?</p> <p>17 A Yeah. Driving car.</p> <p>18 Q Well, what else did she say about</p> <p>19 Mr. Han?</p> <p>20 A Still I remember back to our like CCP</p> <p>21 persecution chat. Mr. Han has his family member</p> <p>22 mainland of China also. So they are threatened</p> <p>23 and even arrested, integrated by Chinese Communist</p> <p>24 Party also.</p> <p>25 * Q Did you tell Mei Guo that you're</p> <p style="text-align: right;">Page 32</p>
<p>1 YVETTE WANG</p> <p>2 testimony. But I think we exhausted</p> <p>3 the witness on this.</p> <p>4 Q I do have a question. Did Guo Mei</p> <p>5 mention to you Han Chung Uang?</p> <p>6 A Yes.</p> <p>7 Q What did she say?</p> <p>8 A I don't remember the precise quotes</p> <p>9 again. Kind of like she told me Mr. Han, she</p> <p>10 trusted her -- trusted him, and he was running</p> <p>11 Eastern before.</p> <p>12 And Mei Guo, she has no problem or</p> <p>13 issue with him, and having him still running</p> <p>14 something on behalf of Eastern Profit.</p> <p>15 Q Did she say whether he actually still</p> <p>16 was running something on Eastern Profit?</p> <p>17 A Sorry. What's your question?</p> <p>18 Q Did she say whether he actually still</p> <p>19 was running something on behalf of Eastern Profit?</p> <p>20 A You mean he; right?</p> <p>21 Q Right.</p> <p>22 A You're asking what time period?</p> <p>23 Q I'm trying to understand what she</p> <p>24 told you.</p> <p>25 A Of course.</p> <p style="text-align: right;">Page 31</p>	<p>1 YVETTE WANG</p> <p>2 member of the Chinese Communist Party?</p> <p>3 MS. CLINE: Objection. This is</p> <p>4 a deposition in her corporate</p> <p>5 capacity. This is not about Miss</p> <p>6 Wong personally, and we really need</p> <p>7 to move on and get to the substance</p> <p>8 as to our agreement and the court's</p> <p>9 order.</p> <p>10 MR. GREIM: Okay. That's the</p> <p>11 last question, and we'll move on to</p> <p>12 your other prep for this deposition.</p> <p>13 MS. CLINE: No. I object to the</p> <p>14 question as beyond the scope.</p> <p>15 MR. GREIM: Well, the witness</p> <p>16 opened the door by talking about this</p> <p>17 persecution of Mr. Han.</p> <p>18 MS. CLINE: No. No. No. I</p> <p>19 object. We can call the court on</p> <p>20 this one if you want to, and we can</p> <p>21 make a list of everybody, and we're</p> <p>22 going to call the court.</p> <p>23 You're asking her about</p> <p>24 questions in her personal capacity,</p> <p>25 and that's not why she's here.</p> <p style="text-align: right;">Page 33</p>

9 (Pages 30 to 33)

Atkinson-Baker, Inc.
www.depo.com

1 YVETTE WANG
2 MR. GREIM: We will just simply
3 mark that and keep going.
4 **Q Okay. You said you also talked to**
5 **Mr. Han Chung Uang who you characterized as a**
6 **representative of Eastern Profit.**
7 **When did you talk to Han Chung Uang**
8 **in preparation for this case? Let me give you a**
9 **different question.**
10 **When did you talk with Mr. Han Chung**
11 **Uang in preparation for this deposition?**
12 A Again, this deposition was ordered
13 like two, three ago. How I can prepare something
14 which by then was not expected to happen with a
15 precise date?
16 My answer is I didn't talk to Mr. Han
17 right before this deposition was ordered.
18 **Q Okay. Fair enough. I will ask you a**
19 **question that covers a little bit more.**
20 **I would like to know whether you have**
21 **gained information from talking to Han Chung Uang**
22 **that you will use to answer the questions today?**
23 A Obtained?
24 **Q Obtained.**
25 A Yes, I did.

Page 34

1 YVETTE WANG
2 **Q So when -- when were the**
3 **conversations that you had with Mr. Han Chung Uang**
4 **about Eastern Profit since your last deposition?**
5 A When? Since my last deposition. My
6 last deposition is January of this year; right?
7 Yeah, the conversation for sure
8 happened in this year, yeah.
9 **Q Okay. So we know you did not talk to**
10 **him before your last deposition. So my question**
11 **is that was January 31st, 2019. When have you**
12 **talked to him since then to gain information about**
13 **Eastern Profit?**
14 A A couple of months ago.
15 **Q A couple of months ago?**
16 A Yes.
17 **Q Was that the only time you talked to**
18 **Mr. Chung Uang to gain information about Eastern**
19 **Profit?**
20 A You mean after my first deposition?
21 **Q Correct.**
22 A Correct.
23 **Q Was the conversation with Mr. Chung**
24 **Uang before or after your conversation with Mei**
25 **Guo?**

Page 35

1 YVETTE WANG
2 A Should be after, yeah.
3 **Q Why do you say that?**
4 A Because was Mei Guo, as I said, in
5 summer, yeah. With Mr. Han should be like end of
6 the summer.
7 **Q Where did you meet with Mr. Han?**
8 A I met him in the lobby of my office.
9 **Q This is the 162 East 64th Street?**
10 A Yes.
11 **Q How long was your conversation with**
12 **him?**
13 A Not very long. Like 20, 30 minutes.
14 **Q So did you talk right there in the**
15 **lobby of Golden Spring?**
16 A The lobby? I don't mean like a
17 public everyone goes in and out. Yeah. There is
18 a conference room in the lobby.
19 **Q What did you ask Mr. Han?**
20 A He asked me.
21 **Q He asked you questions?**
22 A Yeah.
23 **Q What did he ask you?**
24 A He told me he was chased by the
25 lender for the one minute.

Page 36

1 YVETTE WANG
2 **Q For the what?**
3 A One million.
4 MS. CLINE: One million.
5 A U.S. dollars.
6 **Q I see.**
7 A He told me he doesn't speak too much
8 English, and he asked me to handle this.
9 **Q What do you mean the lender of the**
10 **\$1 million? What are you referring to?**
11 A I don't remember precisely his quote.
12 He said kind of like as per the loan agreement,
13 Eastern should pay back the 1 million loan.
14 And he was not sure, and he doesn't
15 know about the litigation, so he ask me to
16 continue, help and handle completely.
17 **Q Did Mr. Chung Uang say that someone**
18 **else told him that Eastern Profit should pay back**
19 **the million dollars, or did he tell you that**
20 **Eastern Profit should pay back the \$1 million?**
21 A He told me Eastern Profit borrowed
22 this 1 million, and now Eastern is unable to pay
23 back that. He was chased.
24 **Q Did he tell you who Eastern Profit**
25 **borrowed the money from?**

Page 37

10 (Pages 34 to 37)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A ACA.</p> <p>3 Q ACA?</p> <p>4 A ACA.</p> <p>5 Q Did he tell you that someone, a</p> <p>6 person actually chased him around New York City</p> <p>7 for the money? I'm trying to understand what you</p> <p>8 mean by chased? What do you mean by chased?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Q What do you mean by chased?</p> <p>11 A What do you mean by chased? What do</p> <p>12 you mean by chased, like a stalk.</p> <p>13 Q Did he explain to you what he meant</p> <p>14 by chased? Is that the word he used?</p> <p>15 A He speaks Mandarin, Chinese.</p> <p>16 Q True. Okay. What did he tell you</p> <p>17 about the efforts of ACA to recover the</p> <p>18 \$1 million?</p> <p>19 A Oh, okay. He mentioned to me he was</p> <p>20 like called. Called. Called by a phone call.</p> <p>21 Q Called?</p> <p>22 A Yeah. And, yeah, like called like a</p> <p>23 couple of times he said.</p> <p>24 Q Did he say when he received the phone</p> <p>25 calls?</p> <p style="text-align: right;">Page 38</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Same objection.</p> <p>3 A What is your question?</p> <p>4 Q Is dealing with ACA on behalf of</p> <p>5 Eastern Profit regarding the \$1 million loan part</p> <p>6 of GSNY's duties under the limited Power of</p> <p>7 Attorney? I'm asking you for your understanding</p> <p>8 as Eastern Profit.</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A I don't know what you mean dealing</p> <p>11 with.</p> <p>12 Q Communicating with ACA.</p> <p>13 A When? From when to when?</p> <p>14 Q Today.</p> <p>15 A He didn't clearly say that in our</p> <p>16 conversation, but my understanding should be yes.</p> <p>17 Q So Eastern Profit believes that it is</p> <p>18 authorized to deal with -- I'm sorry. Eastern</p> <p>19 Profit believes that Golden Spring is authorized</p> <p>20 to deal directly with ACA on repayment of the</p> <p>21 loan?</p> <p>22 MS. CLINE: Objection to the</p> <p>23 form. We may be going beyond the</p> <p>24 scope. It's not a memory test. If</p> <p>25 you have a question about the POA,</p> <p style="text-align: right;">Page 40</p>
<p>1 YVETTE WANG</p> <p>2 A I guess -- I couldn't guess, of</p> <p>3 course. Before he talk to me.</p> <p>4 Q Were they recent or they happened a</p> <p>5 long time ago?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 A I didn't ask him, but he was saying</p> <p>8 that he wanted me to continue handle all of this.</p> <p>9 Q What did he mean by all of this?</p> <p>10 MS. CLINE: Objection.</p> <p>11 Foundation.</p> <p>12 Q What did you understand that he meant</p> <p>13 when he said continue to handle all of this?</p> <p>14 A You're asking my understanding?</p> <p>15 Q Yes.</p> <p>16 A My understanding is we were</p> <p>17 authorized by a limited POA to deal with the</p> <p>18 contract until now including litigation, including</p> <p>19 like now I sit in front of you to be questioned.</p> <p>20 Q Is dealing with ACA on the loan part</p> <p>21 of the Limited Power of Attorney?</p> <p>22 MS. CLINE: Objection to the</p> <p>23 form.</p> <p>24 Q Is that covered within the limited</p> <p>25 Power of Attorney?</p> <p style="text-align: right;">Page 39</p>	<p>1 YVETTE WANG</p> <p>2 you can put it in front of her and</p> <p>3 ask her.</p> <p>4 A What's the question?</p> <p>5 Q Would you need to see the Power of</p> <p>6 Attorney to answer that question?</p> <p>7 A Yeah. That would be great.</p> <p>8 Q Okay. Let's do that.</p> <p>9 (Guo Exhibit 2, Limited Power of</p> <p>10 Attorney Bates stamped Eastern-000276</p> <p>11 and 277 previously marked for</p> <p>12 Identification as of this date.)</p> <p>13 I'm going to hand you what we marked</p> <p>14 as Guo Exhibit 2. We're not going to remark this.</p> <p>15 I'm just going to hand you what we marked as Guo</p> <p>16 Exhibit 2. Please give one to your attorney. And</p> <p>17 you'll see it already says Guo Exhibit 2, and it's</p> <p>18 Bates labeled 276 -- Eastern 276 to Eastern 277.</p> <p>19 Do you recognize this document?</p> <p>20 A Yes.</p> <p>21 Q Is this the Limited Power of Attorney</p> <p>22 that Eastern Profit granted to Golden Spring, New</p> <p>23 York?</p> <p>24 A Yes.</p> <p>25 Q And is the negotiation of -- we'll</p> <p style="text-align: right;">Page 41</p>

11 (Pages 38 to 41)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 start with -- I'm going to break this apart.</p> <p>3 Okay?</p> <p>4 I'm going to ask you about the loan</p> <p>5 that Eastern Profit claims it has with ACA. Okay?</p> <p>6 My first question is is negotiation of that loan</p> <p>7 between Eastern Profit and ACA one of the powers</p> <p>8 that Eastern Profit granted Golden Spring under</p> <p>9 this Power of Attorney?</p> <p>10 MS. CLINE: You're asking her to</p> <p>11 read the document?</p> <p>12 Q I'm asking for Eastern Profit's</p> <p>13 testimony. If you want to look at the document if</p> <p>14 that would help, that's fine. If you think you</p> <p>15 personally know it, that's fine too.</p> <p>16 MS. CLINE: This deposition is</p> <p>17 not about her personal knowledge.</p> <p>18 A Can I read this?</p> <p>19 Q Go ahead.</p> <p>20 A (Reading) What's your question?</p> <p>21 Q I'll have the court reporter just</p> <p>22 read it back.</p> <p>23 (The requested portion of the</p> <p>24 record was read back by the</p> <p>25 reporter.)</p> <p style="text-align: right;">Page 42</p>	<p>1 YVETTE WANG</p> <p>2 Has Eastern Profit asked Golden</p> <p>3 Spring New York to deal on Eastern Profit's behalf</p> <p>4 with ACA regarding the loan?</p> <p>5 A You asked about when?</p> <p>6 Q As of now.</p> <p>7 A In my conversation with Mr. Han, he</p> <p>8 mentioned to me or he asked me can you please</p> <p>9 explain what is happening to ACA about this loan,</p> <p>10 because I was or I am chased to ask before pay</p> <p>11 back. I don't know how to explain to ACA.</p> <p>12 Q How did you respond him?</p> <p>13 A I said okay.</p> <p>14 Q Was this the first time Mr. Chunguang</p> <p>15 had told you that ACA was trying to recover this</p> <p>16 million dollar payment?</p> <p>17 A I don't remember clearly, but yes.</p> <p>18 Q Before your conversation with</p> <p>19 Mr. Chunguang, had you heard from anyone, from any</p> <p>20 other source, that ACA was trying to recover the</p> <p>21 million dollar payment?</p> <p>22 A What's your question?</p> <p>23 Q Before this conversation with</p> <p>24 Mr. Chunguang, had you heard from anyone, from any</p> <p>25 other source that ACA was trying to recover the</p> <p style="text-align: right;">Page 44</p>
<p>1 YVETTE WANG</p> <p>2 MS. CLINE: I'm going to repeat</p> <p>3 my objection to form. You're asking</p> <p>4 the witness to interpret a document</p> <p>5 that speaks for itself and we can all</p> <p>6 read.</p> <p>7 A This limited Power of Attorney in my</p> <p>8 understanding is talking about Eastern Profit's</p> <p>9 Corporation Limited authorized Golden Spring New</p> <p>10 York Limited to deal with the contract with</p> <p>11 Strategic Vision.</p> <p>12 Q There's no reference to ACA in here,</p> <p>13 is there?</p> <p>14 A I didn't see that name on these two</p> <p>15 pages.</p> <p>16 Q So let me ask you this. Separate and</p> <p>17 apart from this Limited Power of Attorney, has</p> <p>18 Eastern Profit asked Golden Spring New York to</p> <p>19 deal with ACA regarding the purported Eastern</p> <p>20 Profit ACA loan?</p> <p>21 A What do you mean purported?</p> <p>22 Q The loan.</p> <p>23 A Okay.</p> <p>24 Q Has Eastern Profit -- I'll repeat the</p> <p>25 question.</p> <p style="text-align: right;">Page 43</p>	<p>1 YVETTE WANG</p> <p>2 million dollar payment?</p> <p>3 A Yes, I did.</p> <p>4 Q From where?</p> <p>5 A I remember ACA mentioned this to me</p> <p>6 also.</p> <p>7 Q When was that?</p> <p>8 A Kind of like by the -- long time ago.</p> <p>9 By the end of or fall of 2018.</p> <p>10 Q Who is the person from ACA who</p> <p>11 contacted you?</p> <p>12 A William.</p> <p>13 Q William who?</p> <p>14 A William Yu.</p> <p>15 Q How do you spell that in English?</p> <p>16 A William?</p> <p>17 Q No. Yu.</p> <p>18 A Y-U.</p> <p>19 Q Is William Yu also sometimes called</p> <p>20 William Je, J-E?</p> <p>21 A I don't know his other name.</p> <p>22 Q Does he also go by Je Kin Ming, J-E</p> <p>23 K-I-N M-I-N-G?</p> <p>24 A I just know his name is William.</p> <p>25 Q Did William reach out to you by phone</p> <p style="text-align: right;">Page 45</p>

12 (Pages 42 to 45)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 or E-mail?</p> <p>3 A In the fall of 2018, like last year,</p> <p>4 a year ago, I believe I met him in the restaurant</p> <p>5 again.</p> <p>6 Q And he mentioned it over lunch or</p> <p>7 dinner?</p> <p>8 A Dinner?</p> <p>9 Q Yes, over dinner?</p> <p>10 A Yes, dinner.</p> <p>11 Q Who else was present, if anyone?</p> <p>12 A Just me and him.</p> <p>13 Q What did he say?</p> <p>14 A About what?</p> <p>15 Q About the million dollar loan.</p> <p>16 A I don't remember precisely what he</p> <p>17 said. Kind of he asked, I heard you are cheated,</p> <p>18 and then I briefly told her.</p> <p>19 Q Told him?</p> <p>20 A Yeah, told him. Yeah. We were</p> <p>21 cheated by two liars.</p> <p>22 Q So did he demand repayment of the</p> <p>23 million dollars from Eastern Profit?</p> <p>24 A You mean in our dinner?</p> <p>25 Q Yes.</p> <p style="text-align: right;">Page 46</p>	<p>1 YVETTE WANG</p> <p>2 Q Did you tell him at the dinner that</p> <p>3 you met Eastern?</p> <p>4 A What's the question?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 Q Did you tell him at the dinner that</p> <p>7 when you said that you were cheated, you actually</p> <p>8 meant Eastern?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You mean I mean Eastern or I said</p> <p>11 Eastern? What is the question?</p> <p>12 Q Did you tell Mr. Je or Mr. Yu that</p> <p>13 Eastern was the one that was cheated?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I didn't pronounce Eastern is worse,</p> <p>16 but I said I was cheated. We were cheated. Which</p> <p>17 if you want to understand who they are, we or I,</p> <p>18 in my understanding they are the Eastern people,</p> <p>19 not including myself.</p> <p>20 Q Who else?</p> <p>21 A Who else?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A Oh, yeah. I forgot this one. Miles,</p> <p>24 M-I-L-E-S.</p> <p>25 Q This is Guo Wengui?</p> <p style="text-align: right;">Page 48</p>
<p>1 YVETTE WANG</p> <p>2 A He mentioned that. Kind of a -- he</p> <p>3 said we are expecting the result, but you are</p> <p>4 cheated. And the loan agreement, the loan kind of</p> <p>5 like need to be pay back.</p> <p>6 Q What result did he say he was</p> <p>7 expecting?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A Generally they corrupted Chinese</p> <p>10 official information.</p> <p>11 Q So William Je said he expected that</p> <p>12 information?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A Correct.</p> <p>15 Q Did you tell him that, in fact, you</p> <p>16 were cheated?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Yes.</p> <p>19 Q And who is the "you" who was cheated?</p> <p>20 A Myself.</p> <p>21 Q "You," Yang Ping Wang? (Phonetic)</p> <p>22 A When I say I was cheated, I mean I</p> <p>23 should say Eastern, because -- if you're asking</p> <p>24 about contract. But I was authorized by Eastern.</p> <p>25 So if I say I, I mean Eastern.</p> <p style="text-align: right;">Page 47</p>	<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q Okay. Who else?</p> <p>4 A Man Cho Han.</p> <p>5 Q Who else?</p> <p>6 A Who do you want else?</p> <p>7 Q Who were the people? You said the</p> <p>8 Eastern people were cheated. I'm asking who are</p> <p>9 those Eastern people that you are referring to?</p> <p>10 You mentioned Guo, you mentioned</p> <p>11 Lianchao.</p> <p>12 A You cannot define my term by</p> <p>13 yourself, okay. I say Eastern people. I don't</p> <p>14 mean Eastern's employee, or Eastern's director or</p> <p>15 Eastern's like whatever.</p> <p>16 I mean the people on Eastern's side</p> <p>17 who are authorized, who is designated, and who has</p> <p>18 the same goal to take down Chinese Communist</p> <p>19 Party.</p> <p>20 That is my definition about Eastern</p> <p>21 people.</p> <p>22 Q Very good. We'll come back to that.</p> <p>23 That's a separate section. So let me bring us</p> <p>24 back to the outline here so I cover everything.</p> <p>25 Before we leave this discussion with</p> <p style="text-align: right;">Page 49</p>

13 (Pages 46 to 49)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 William Yu, did you commit to him that Eastern</p> <p>3 Profit would pay him back the million dollars?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A What do you mean committed?</p> <p>6 Q Tell.</p> <p>7 A In my understanding, this is a low</p> <p>8 agreement between lender and a borrower. And the</p> <p>9 borrower should pay back the money, which means</p> <p>10 Eastern should pay back.</p> <p>11 Q My question is what you told him</p> <p>12 though. Not how you characterize this, but my</p> <p>13 question is: What did you tell Mr. Yu?</p> <p>14 A I prefer not to use told. I agreed.</p> <p>15 Q So you -- so Mr. Yu told you that he</p> <p>16 expected Eastern Profit to pay a million dollars</p> <p>17 to ACA. You told him that you agreed?</p> <p>18 A With interest.</p> <p>19 Q With interest?</p> <p>20 A Yeah.</p> <p>21 Q Did you have authority to tell Mr. Yu</p> <p>22 that on behalf of Eastern?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A Authority? What do you mean</p> <p>25 authority?</p> <p style="text-align: right;">Page 50</p>	<p>1 YVETTE WANG</p> <p>2 Mr. Yu, had Eastern Profit given you authority to</p> <p>3 deal with Mr. Yu about repayment of the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A When William mentioned to me I will</p> <p>6 have to ask the loan to be asked. I have to ask</p> <p>7 the loan to be fully paid back with interest. I</p> <p>8 said yes. I agree with you. I didn't say there</p> <p>9 is any reason. You couldn't.</p> <p>10 Q My question to you --</p> <p>11 A That was my conversation with William</p> <p>12 about this loan.</p> <p>13 Q Okay. My question now to you is</p> <p>14 Eastern Profit is -- were you acting as Eastern</p> <p>15 Profit's agent in having that discussion with</p> <p>16 William Yu about the loan?</p> <p>17 A You mean before my dinner with</p> <p>18 William?</p> <p>19 Q During your dinner with William, were</p> <p>20 you acting as Eastern Profits' agent in saying</p> <p>21 yes, I agree with you that the loan should be</p> <p>22 repaid, or you're just expressing your own</p> <p>23 personal opinion?</p> <p>24 A Oh. It's much easier to understand</p> <p>25 now. I would express my personal opinion and</p> <p style="text-align: right;">Page 52</p>
<p>1 YVETTE WANG</p> <p>2 Q Well, had Eastern given you authority</p> <p>3 to deal with ACA regarding the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A Deal with ACA about the loan? It's</p> <p>6 too general. I couldn't understand your question.</p> <p>7 Q Well, we just looked at the limited</p> <p>8 Power of Attorney. It's not in there; is it?</p> <p>9 MS. CLINE: Objection.</p> <p>10 A What is not there?</p> <p>11 Q Your authority to deal with ACA</p> <p>12 regarding its purported loan to Eastern Profit is</p> <p>13 not set forth in the Power of Attorney; is it? We</p> <p>14 just looked at it.</p> <p>15 MS. CLINE: Objection. You're</p> <p>16 mischaracterizing the document and</p> <p>17 her testimony, and I think you're</p> <p>18 trying to confuse the witness. She's</p> <p>19 here as a representative of Eastern</p> <p>20 Profit. Later you can ask her about</p> <p>21 the role of Golden Spring.</p> <p>22 Q I'm asking for Eastern Profit's</p> <p>23 understanding about what power you had to deal</p> <p>24 with ACA regarding the loan.</p> <p>25 So when you were speaking with</p> <p style="text-align: right;">Page 51</p>	<p>1 YVETTE WANG</p> <p>2 Eastern's also.</p> <p>3 Q So why are you able to say that you</p> <p>4 were expressing Eastern's opinion?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A You're asking my personal</p> <p>7 understanding; right?</p> <p>8 Q No. I'm asking why is -- Eastern is</p> <p>9 sitting here today telling me that when you told</p> <p>10 William Yu yes, I agree with you, that you were</p> <p>11 speaking on behalf of it. And I'm saying on what</p> <p>12 basis. How or why did Eastern give you authority</p> <p>13 to speak on its behalf with William Yu?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I still don't quite understand your</p> <p>16 question.</p> <p>17 Q Okay. We'll break it down. We'll</p> <p>18 break it down.</p> <p>19 Did someone from Eastern tell you</p> <p>20 that you should deal with William Yu regarding the</p> <p>21 purported ACA to Eastern Profit loan?</p> <p>22 A By that dinner, I don't remember</p> <p>23 clearly. I don't remember clearly. I was talking</p> <p>24 with William. Again, I was thinking that I have</p> <p>25 this case in my hands. And this is a -- sounds</p> <p style="text-align: right;">Page 53</p>

14 (Pages 50 to 53)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 like in my understanding a no more business loan</p> <p>3 agreement, and people should pay back.</p> <p>4 Q Now do you recall on January 31, 2019</p> <p>5 at your first deposition you testified that you</p> <p>6 had not seen the loan agreement.</p> <p>7 Do you recall that?</p> <p>8 MS. CLINE: Objection. If you</p> <p>9 want to ask her about her testimony,</p> <p>10 you can show her the transcript.</p> <p>11 Q I'm happy to show you the transcript.</p> <p>12 Do you want to look at it?</p> <p>13 Let me do this. Do you recall</p> <p>14 offhand whether you had seen the loan agreement</p> <p>15 yet when you gave your first deposition in this</p> <p>16 case?</p> <p>17 A You're asking when I was deposed for</p> <p>18 the first time, by then did I ever see with my own</p> <p>19 eyes the loan agreement or not?</p> <p>20 Q Right.</p> <p>21 A I heard --</p> <p>22 Q Right.</p> <p>23 A -- the loan agreement.</p> <p>24 Q So as of January, 2019, you had heard</p> <p>25 there was a loan agreement. You had not yet seen</p> <p style="text-align: right;">Page 54</p>	<p>1 YVETTE WANG</p> <p>2 A Oh. In my dinner --</p> <p>3 Q Yes.</p> <p>4 A -- with William?</p> <p>5 Q Yes.</p> <p>6 A I told him Eastern should pay back.</p> <p>7 Q Did Eastern have an understanding how</p> <p>8 it was going to pay back the loan?</p> <p>9 A By this lawsuit. That's why Eastern</p> <p>10 sued, to get this 1 million back, because</p> <p>11 Eastern's bank account was frozen.</p> <p>12 Q It wasn't frozen yet at that time in</p> <p>13 the fall of 2018?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A Eastern's bank account was frozen</p> <p>16 around June of 2018, yes.</p> <p>17 Q Although that was after the lawsuit</p> <p>18 was filed, wasn't it? The lawsuit was filed in</p> <p>19 March of 2018; isn't that right?</p> <p>20 MS. CLINE: Objection again.</p> <p>21 This is a memory test.</p> <p>22 A Oh, yeah. This is a memory test. My</p> <p>23 mistake.</p> <p>24 You're confusing me with all these</p> <p>25 dates back and forward, Eddie.</p> <p style="text-align: right;">Page 56</p>
<p>1 YVETTE WANG</p> <p>2 it?</p> <p>3 A Correct.</p> <p>4 Q So this discussion with Mr. Yu</p> <p>5 happened in the fall of 2018. You just testified</p> <p>6 several months before your deposition. So when</p> <p>7 you were speaking with Mr. Yu, you had not yet</p> <p>8 seen the loan agreement; correct?</p> <p>9 A I did not see physically the hard</p> <p>10 copy paper in front of me was my personal</p> <p>11 knowledge. I was testifying my gained knowledge</p> <p>12 or obtained knowledge.</p> <p>13 Q When did you first hear that there</p> <p>14 was a loan between ACA and EP, Eastern Profit.</p> <p>15 A 2018.</p> <p>16 Q Was it before the dinner with Mr. Yu?</p> <p>17 A I don't remember that.</p> <p>18 Q Do you think maybe you learned of the</p> <p>19 loan agreement from Mr. Yu?</p> <p>20 A Possibly. I don't remember that</p> <p>21 clearly.</p> <p>22 Q Did you tell Mr. Yu how Eastern</p> <p>23 Profit intended to repay the loan?</p> <p>24 A Intend? What do you mean intend?</p> <p>25 Q Planned.</p> <p style="text-align: right;">Page 55</p>	<p>1 YVETTE WANG</p> <p>2 So correction. Eastern's bank</p> <p>3 account was frozen. When is it this contract was</p> <p>4 signed with SV's contract.</p> <p>5 Q It's dated -- it was signed</p> <p>6 January 6, 2018.</p> <p>7 A January, 2018. Eastern's bank</p> <p>8 account was frozen in June of 2017. This is the</p> <p>9 correct answer.</p> <p>10 MS. CLINE: Can we take a break</p> <p>11 pretty soon. We've being going for</p> <p>12 over an hour.</p> <p>13 MR. GREIM: Yes. Good point.</p> <p>14 I'm going to finish up with this.</p> <p>15 I'm thinking the same thing because</p> <p>16 I'm running low.</p> <p>17 Q Let me go back to your discussion</p> <p>18 with Mr. Chunguang.</p> <p>19 Who did he say was calling him from</p> <p>20 ACA?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A What was the question?</p> <p>23 Q You said that Mr. Chunguang told you</p> <p>24 somebody was chasing him about the million dollar</p> <p>25 loan.</p> <p style="text-align: right;">Page 57</p>

15 (Pages 54 to 57)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q I gather that somebody was not</p> <p>4 actually following him around the streets for</p> <p>5 collection. I gather that you mean somebody was</p> <p>6 contacting him; correct?</p> <p>7 A Correct.</p> <p>8 Q And who was the person who was</p> <p>9 contacting him?</p> <p>10 MS. CLINE: Objection.</p> <p>11 Q Who did he say?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 A You're asking the name; right?</p> <p>14 Q Yes. Yes.</p> <p>15 A William.</p> <p>16 Q Did he say whether William -- this is</p> <p>17 the same William Yu, or the same William Yu that</p> <p>18 you mentioned before?</p> <p>19 A Correct.</p> <p>20 Q Did he say how William Yu was</p> <p>21 contacting him?</p> <p>22 A What was the question?</p> <p>23 Q Did he say how William Yu was</p> <p>24 contacting him?</p> <p>25 A You mean by what kind of a</p> <p style="text-align: right;">Page 58</p>	<p>1 YVETTE WANG</p> <p>2 Q Yes I am, actually.</p> <p>3 A Wow. Year?</p> <p>4 Q Something he said gave you the</p> <p>5 impression that the calls had been happening for</p> <p>6 about a year?</p> <p>7 A Yes.</p> <p>8 Q But you can't remember the exact</p> <p>9 words he used?</p> <p>10 A If you want me to translate, because</p> <p>11 he speaks Mandarin, he used long time, always some</p> <p>12 words like that.</p> <p>13 Q Did he know William Je by the way;</p> <p>14 was William Je known to him?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Foundation.</p> <p>17 This is beyond the scope of a</p> <p>18 30(b)(6) of Eastern Profit.</p> <p>19 Q It's important to understand whether</p> <p>20 the Eastern Profit purported representative</p> <p>21 dealing with ACA on repayment of the loan, whether</p> <p>22 they're known to each other or not.</p> <p>23 Did you get the understanding from</p> <p>24 talking to Mr. Han that he was already familiar</p> <p>25 with William Yu?</p> <p style="text-align: right;">Page 60</p>
<p>1 YVETTE WANG</p> <p>2 communication tool; right?</p> <p>3 Q Yes. Yes.</p> <p>4 A He said phone call.</p> <p>5 Q Did he say how many phone calls?</p> <p>6 A A couple of.</p> <p>7 Q And your testimony is he did not say</p> <p>8 when he had received these phone calls?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A You're asking did he tell me on which</p> <p>11 dates he was caught?</p> <p>12 Q Just generally when. If he gave you</p> <p>13 dates, great.</p> <p>14 A Which unfortunately he didn't give me</p> <p>15 the dates.</p> <p>16 Q Did he tell you it was recent?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Not only recent. Yeah. He said --</p> <p>19 he told me he was called or he was chased for long</p> <p>20 time.</p> <p>21 Q Just a few more questions, and then</p> <p>22 we will take a break here.</p> <p>23 What do you mean for a long time?</p> <p>24 A You're asking my personal</p> <p>25 understanding?</p> <p style="text-align: right;">Page 59</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, this is a</p> <p>3 corporate designee deposition of</p> <p>4 Eastern Profit. You subpoenaed</p> <p>5 everyone whose name has ever been</p> <p>6 mentioned in this case. You can ask</p> <p>7 more appropriate people those types</p> <p>8 of questions.</p> <p>9 MR. GREIM: Okay. I'll just ask</p> <p>10 Eastern Profit.</p> <p>11 Q Was William Yu familiar with -- I'm</p> <p>12 sorry. Was Mr. Han familiar with William Yu?</p> <p>13 MS. CLINE: Objection.</p> <p>14 Foundation.</p> <p>15 A I don't remember my filling, that</p> <p>16 conversation. Eddie is asking my personal</p> <p>17 filling.</p> <p>18 Q Well I'm not asking -- I'm asking --</p> <p>19 forget about your feelings. Sorry. It sounds</p> <p>20 terrible.</p> <p>21 A I'm fine.</p> <p>22 Q I'm asking Eastern Profit whether the</p> <p>23 person it claims is its principal is familiar with</p> <p>24 William Yu.</p> <p>25 MS. CLINE: Objection.</p> <p style="text-align: right;">Page 61</p>

16 (Pages 58 to 61)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG 2 Foundation. 3 You're going to depose Mr. Han. 4 You can ask him a question directly. 5 MR. GREIM: Okay. If this 6 representative doesn't know that, 7 that's okay. 8 Q But if Eastern Profit knows the 9 answer, I would like to know the answer. 10 A I cannot talk on behalf of any 11 individual. His or her personal knows someone or 12 don't know someone, familiar with someone or not 13 familiar with someone. 14 MR. GREIM: All right. Let's 15 take a break. Let's take a 10-minute 16 break, if that's okay. 17 Does that make sense? 18 THE VIDEOGRAPHER: The time is 19 11:36 a.m., Wednesday, October 30, 20 2019. This is the end of media 21 number one of the videotaped 22 deposition of Miss Yvette Wang. 23 We are off the record. 24 (At this time, a brief recess 25 was taken.)</p> <p style="text-align: right;">Page 62</p>	<p>1 YVETTE WANG 2 ACA regarding the million dollar loan? 3 MS. CLINE: Objection to form. 4 A In my understanding from the moment I 5 knew the loan, I should help Eastern to handle 6 everything. 7 Q From the first time you learned of 8 the loan, you believed it was your responsibility 9 to handle issues regarding the loan? 10 MS. CLINE: Objection to form. 11 A Yes. 12 Q And you first learned of the loan 13 sometime in 2018; right? 14 A Yes. 15 Q Possibly you learned of it for the 16 first time in your dinner with William Yu? 17 MS. CLINE: Asked and answered. 18 A I believe you asked this question 19 already. The answer is possibly. 20 Q So what has Eastern done, or what has 21 Eastern told you to make you believe that you have 22 authority on its behalf to deal with ACA regarding 23 the loan? 24 MS. CLINE: Objection to form. 25 She's already testified about her</p> <p style="text-align: right;">Page 64</p>
<p>1 YVETTE WANG 2 THE VIDEOGRAPHER: The time is 3 11:51 a.m., Wednesday, October 30, 4 2019. This is media number 2 of the 5 videotaped deposition of this event. 6 We're back on the record. 7 CONTINUED EXAMINATION 8 BY MR. GREIM: 9 Q Okay. I want to clear up a few 10 things from our last round of questions, and then 11 we'll move on to a new topic. Okay? 12 A (Nodding) 13 Q In your conversation with Guo Mei, 14 did she ask you to handle Eastern Profit's 15 interactions with ACA regarding the million dollar 16 loan? 17 A You mean our dinner? 18 Q Yes. 19 A She didn't specifically say the 20 details, but basically she said, "I don't know any 21 of this. Please handle all of this." 22 Q So is it Eastern Profit's position 23 that -- let me back up. 24 Is it Eastern Profit's position that 25 you are to handle negotiations or discussions with</p> <p style="text-align: right;">Page 63</p>	<p>1 YVETTE WANG 2 responsibilities. 3 A I will repeat my answer again. 4 Both Mr. Han and Miss Mei Guo told me 5 can you please handle everything, because we do 6 not know the details. 7 Q But those two conversations happened 8 in the summer and the late summer of 2019; right? 9 MS. CLINE: Objection to form. 10 A Yes. 11 Q So how did you get authority from 12 Eastern Profit before that time to deal with ACA 13 regarding the loan? 14 A What's your question? 15 Q How did you get authority from 16 Eastern Profit before your discussions with Guo 17 Mei and Han Chunguang to deal with ACA regarding 18 the loan? 19 A What I say before this conversation? 20 Q For example your fall, 2018 dinner 21 meeting with William Yu. 22 A In my understanding, that was a 23 dinner. It's not specifically about anything. 24 Q Well, you testified earlier that when 25 you said yes, I agree, that you were speaking on</p> <p style="text-align: right;">Page 65</p>

17 (Pages 62 to 65)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 behalf of Eastern Profit as well as on behalf of</p> <p>3 yourself.</p> <p>4 So who from Eastern Profit gave you</p> <p>5 authority to deal with William Yu on that behalf</p> <p>6 in the fall of 2018?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A Eddie, can you please break your</p> <p>9 question, because I am not English native speaker.</p> <p>10 Q Okay. Fair enough. Let's get this</p> <p>11 right.</p> <p>12 Who gave you authority to say yes, I</p> <p>13 agree on behalf of Eastern Profit in the fall of</p> <p>14 2018?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 Assumes facts not in evidence.</p> <p>17 A I believe I am able to represent on a</p> <p>18 normal -- no. I believe I am able to talk on</p> <p>19 behalf of myself. Okay?</p> <p>20 That was William mentioned to me</p> <p>21 about this loan. If you were me, you will say</p> <p>22 "William, wait a second. Let me call someone to</p> <p>23 authorize me to talk to you about this loan."</p> <p>24 You shouldn't; right? You are in</p> <p>25 full capacity as a individual. I was talking by</p> <p style="text-align: right;">Page 66</p>	<p>1 YVETTE WANG</p> <p>2 loan. He said I need this to be paid back with</p> <p>3 interest. I said yes. You know, this is a loan.</p> <p>4 You guys have this common, no more business law</p> <p>5 agreement. The lender and the borrower, they need</p> <p>6 to do what they agree by the law agreement. This</p> <p>7 is precisely I said.</p> <p>8 Okay? I was asked. I cannot say --</p> <p>9 I cannot answer you this question.</p> <p>10 Q So you weren't speaking on behalf of</p> <p>11 Eastern Profit?</p> <p>12 MS. CLINE: Objection. Asked</p> <p>13 and answered. Mischaracterizes her</p> <p>14 testimony. Argumentative.</p> <p>15 Q I guess I'm going to keep going and</p> <p>16 tell you. There's two ways that you can get</p> <p>17 authority to act for Eastern Profit. Either there</p> <p>18 will be some sort of a writing, or somebody will</p> <p>19 tell you.</p> <p>20 I'm asking you which one of the two</p> <p>21 were you acting under when you spoke with Mr. Yu</p> <p>22 at this fall, 2018 meeting?</p> <p>23 MS. CLINE: I repeat all of my</p> <p>24 prior objections. With all due</p> <p>25 respect, your view of authority isn't</p> <p style="text-align: right;">Page 68</p>
<p>1 YVETTE WANG</p> <p>2 then. I don't believe I need to get anyone's</p> <p>3 authorization to discuss about a normal business</p> <p>4 loan agreement.</p> <p>5 Q But you've testified that you were</p> <p>6 speaking not on behalf of yourself, or I should</p> <p>7 say not only on behalf of yourself, but also on</p> <p>8 behalf of Eastern Profit; right?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Now you're arguing with the witness.</p> <p>11 She gave her answer to your</p> <p>12 question. The fact that you don't</p> <p>13 like it doesn't mean you can keep</p> <p>14 arguing with her.</p> <p>15 Q So my question to you is who from</p> <p>16 Eastern Profit gave you authority to deal on its</p> <p>17 behalf with William Yu at the fall, 2018 dinner?</p> <p>18 MS. CLINE: Objection to the</p> <p>19 form.</p> <p>20 Asked and answered.</p> <p>21 Mischaracterizes prior testimony.</p> <p>22 A I replied to you already.</p> <p>23 Q I don't think I have an answer.</p> <p>24 Please answer that question.</p> <p>25 A William mentioned to me about this</p> <p style="text-align: right;">Page 67</p>	<p>1 YVETTE WANG</p> <p>2 the end all, be all of what's proper.</p> <p>3 MR. GREIM: Fair enough.</p> <p>4 MS. CLINE: The witness answered</p> <p>5 your question. And because you don't</p> <p>6 like what she says doesn't mean you</p> <p>7 can keep badgering her.</p> <p>8 MR. GREIM: She's not answering</p> <p>9 the question, and so --</p> <p>10 MS. CLINE: She answered the</p> <p>11 question.</p> <p>12 MR. GREIM: No, she didn't.</p> <p>13 Q So the question is -- let me ask it</p> <p>14 this way.</p> <p>15 Is there any other document that</p> <p>16 granted you authority to act on behalf of Eastern</p> <p>17 Profit before your fall, 2018 meeting with William</p> <p>18 Yu?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A Can you repeat?</p> <p>21 Q Is there any other document other</p> <p>22 than the Limited Power of Attorney that we looked</p> <p>23 at earlier that granted you authority to act on</p> <p>24 behalf of Eastern Profit with respect to the ACA</p> <p>25 loan before the fall, 2018 meeting with William?</p> <p style="text-align: right;">Page 69</p>

18 (Pages 66 to 69)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Eddie,</p> <p>3 you're taking that Power of Attorney,</p> <p>4 which has to do the authority granted</p> <p>5 to Golden Spring, and you're using it</p> <p>6 to misdirect the question to this</p> <p>7 witness who is sitting on behalf of</p> <p>8 Eastern Profit.</p> <p>9 So the Power of Attorney has to</p> <p>10 do with Golden Spring. You can ask</p> <p>11 about that later with respect to</p> <p>12 Golden Spring's authority.</p> <p>13 She's already answered your</p> <p>14 question about her role at Eastern</p> <p>15 Profit multiple times now.</p> <p>16 MR. GREIM: I'm asking for the</p> <p>17 basis of it, and I would ask for the</p> <p>18 speaking objections to stop.</p> <p>19 Q So here's my question. I'm going to</p> <p>20 ask it a third time. I haven't heard an answer</p> <p>21 yet.</p> <p>22 Is there any document that granted</p> <p>23 you authority to deal with William Yu on behalf of</p> <p>24 Eastern Profit relating to the ACA loan before</p> <p>25 your fall, 2018 dinner with William Yu?</p> <p style="text-align: right;">Page 70</p>	<p>1 YVETTE WANG</p> <p>2 words we said in that dinner to help you in here.</p> <p>3 Okay? William mentioned to me I heard you guys</p> <p>4 were cheated by liars, which means I will have to</p> <p>5 ask the loan to be paid back with interest. I</p> <p>6 remember I said yes, sadly, we were cheated, and</p> <p>7 I'm sorry about that.</p> <p>8 And I agree with you, since you guys</p> <p>9 have a law agreement, the borrower should pay you</p> <p>10 back, and we are in litigation right now trying to</p> <p>11 get that 1 million U.S. dollars from the liars</p> <p>12 back.</p> <p>13 Hopefully we can get the justice, and</p> <p>14 that 1 million U.S. dollars can be returned back</p> <p>15 to Eastern Profits with even any damage. So</p> <p>16 Eastern, as you said, you told me borrower can pay</p> <p>17 you back.</p> <p>18 Q Okay. My question --</p> <p>19 A That is precisely a hundred percent.</p> <p>20 No. Too much hundred percent. 99 percent of</p> <p>21 words we used in a conversation.</p> <p>22 Q That was not my question.</p> <p>23 My question is: Was there anyone</p> <p>24 from Eastern Profit who told you that you had</p> <p>25 authority to deal with William Yu on its behalf</p> <p style="text-align: right;">Page 72</p>
<p>1 YVETTE WANG</p> <p>2 A I don't remember that.</p> <p>3 Q Okay did someone from Eastern Profit</p> <p>4 tell you, before the fall, 2018 meeting, that you</p> <p>5 had authority to deal with William Yu on behalf of</p> <p>6 Eastern Profit relating to the ACU loan?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A What's the question?</p> <p>9 Q Did someone from Eastern Profit tell</p> <p>10 you before your 2018 dinner meeting with William</p> <p>11 Yu that you had authority to deal with him on</p> <p>12 Eastern Profit's behalf regarding the ACA loan?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A I don't remember that.</p> <p>15 Q So why do you believe that you did</p> <p>16 have authority to deal with Mr. Yu then?</p> <p>17 MS. CLINE: Asked and answered.</p> <p>18 A Did I believe? You're confusing me.</p> <p>19 Q On what basis does Eastern Profit</p> <p>20 claim that you had authority to deal with William</p> <p>21 Yu regarding the ACA loan at the fall, 2018</p> <p>22 meeting?</p> <p>23 A Eddie, I will repeat my reply for the</p> <p>24 fourth time for you.</p> <p>25 I tried to recall every inch of the</p> <p style="text-align: right;">Page 71</p>	<p>1 YVETTE WANG</p> <p>2 before you had that meeting? It's a yes or no.</p> <p>3 Someone did or someone didn't.</p> <p>4 MS. CLINE: Is not necessarily.</p> <p>5 Objection to form. Asked and</p> <p>6 answered.</p> <p>7 A I don't remember that.</p> <p>8 Q Now had the contract not terminated,</p> <p>9 how was Eastern Profit ever going to pay ACA back?</p> <p>10 A What's the question?</p> <p>11 Q If the contract had not been</p> <p>12 terminated and Strategic Vision had given Eastern</p> <p>13 Profit what it wanted, how was it ever going to</p> <p>14 repay the loan to ACA, or even make interest</p> <p>15 payments?</p> <p>16 A If they're not liars, we were not</p> <p>17 cheated, they're professional qualified</p> <p>18 investigation company. You're talking about if</p> <p>19 that is the scenario.</p> <p>20 Q How is Eastern Profit going to repay</p> <p>21 Strategic or ACA?</p> <p>22 A Which means if this contract with</p> <p>23 Strategic Vision, let's say, let's imagine work</p> <p>24 out, right, succeed by the end; right? Okay.</p> <p>25 Eastern Profit has bank account. And</p> <p style="text-align: right;">Page 73</p>

19 (Pages 70 to 73)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 I heard there are assets. The bank account was</p> <p>3 frozen by Chinese Communist Party in Hong Kong.</p> <p>4 By Eastern believes if the corrupted CCP are taken</p> <p>5 down, they are -- there are assets. Nobody can</p> <p>6 take them.</p> <p>7 So the bank account will be unfrozen,</p> <p>8 and Eastern will back to their normal business.</p> <p>9 Q Which is what?</p> <p>10 A I heard again -- this is my obtain</p> <p>11 knowledge, like investment.</p> <p>12 Q You said that at your first</p> <p>13 deposition. What about investment management?</p> <p>14 A What do you mean investment</p> <p>15 management?</p> <p>16 Q Well I'm just trying to ask you, what</p> <p>17 do you mean investment? What is that? I don't</p> <p>18 understand what you mean by that.</p> <p>19 A It could be like the investment on</p> <p>20 the cars, which they already have right now, in</p> <p>21 any profitable investment.</p> <p>22 What's your question? Sorry.</p> <p>23 Q Are they a car dealership?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 Q You say investment in cars. They</p> <p style="text-align: right;">Page 74</p>	<p>1 YVETTE WANG</p> <p>2 You're asking her the nature of</p> <p>3 Eastern Profit's business. Fine.</p> <p>4 But beyond that, getting into the</p> <p>5 nature of investments and so forth I</p> <p>6 think goes beyond the appropriate</p> <p>7 scope. Again, I know the judge gave</p> <p>8 you seven hours. But we can get to</p> <p>9 the topics we agreed upon and are</p> <p>10 covered by the court's order, that</p> <p>11 would be the goal of this deposition.</p> <p>12 Q What more do you know about Eastern</p> <p>13 Profit's business?</p> <p>14 A Eastern is registered in 2011.</p> <p>15 Q Right.</p> <p>16 A In Hong Kong. They are operating</p> <p>17 from 2011 until they're their bank account was</p> <p>18 frozen.</p> <p>19 Q You said their business is</p> <p>20 investments, which was your answer in the last</p> <p>21 deposition, and also that they own cars.</p> <p>22 Now is this part of their business?</p> <p>23 Do they buy and sell cars, or do they just happen</p> <p>24 to own a company car?</p> <p>25 MS. CLINE: Again, objection.</p> <p style="text-align: right;">Page 76</p>
<p>1 YVETTE WANG</p> <p>2 invest in antique cars?</p> <p>3 A I didn't say that.</p> <p>4 Q Okay. How does one invest in cars?</p> <p>5 MS. CLINE: Objection.</p> <p>6 Q I just want to understand. I don't</p> <p>7 think we have to go far into this. I truly don't</p> <p>8 understand the investment business in cars. What</p> <p>9 do you know about this?</p> <p>10 MS. CLINE: Objection to form</p> <p>11 and mischaracterizes the testimony.</p> <p>12 Q Tell me where I'm wrong. So far we</p> <p>13 know that they own cars and that they do</p> <p>14 investments.</p> <p>15 What more can you tell me about the</p> <p>16 business of Eastern Profit?</p> <p>17 MS. CLINE: I'm going to lodge</p> <p>18 another objection having now brought</p> <p>19 up the opinion which says beyond the</p> <p>20 scope of this testimony is whether</p> <p>21 plaintiff has any independent</p> <p>22 financial identity.</p> <p>23 MR. GREIM: I'm not asking that.</p> <p>24 I'm asking what it does.</p> <p>25 MS. CLINE: Let me finish.</p> <p style="text-align: right;">Page 75</p>	<p>1 YVETTE WANG</p> <p>2 Beyond the scope.</p> <p>3 Q In other words, is this just as an</p> <p>4 asset that they happened to have, in which case I</p> <p>5 don't care about it whatsoever, or is it their</p> <p>6 business to own cars, to invest, buy and sell</p> <p>7 cars?</p> <p>8 A I believe their investment is not</p> <p>9 only buy and sell cars.</p> <p>10 Q Okay. Is that one of the</p> <p>11 investments? Do they make investments in cars?</p> <p>12 A Sorry. What's the question?</p> <p>13 Q Do they make investments in cars?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A They own cars. It could come from</p> <p>16 investment.</p> <p>17 Q Let me ask it this way.</p> <p>18 Do they own a fleet of cars, or do</p> <p>19 they have a few company cars?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A There's no difference in my</p> <p>22 understanding.</p> <p>23 Q Do they have one or two cars, or do</p> <p>24 they have many cars that they have bought as an</p> <p>25 investment?</p> <p style="text-align: right;">Page 77</p>

20 (Pages 74 to 77)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A I didn't ask that details.</p> <p>3 Q So at your last deposition, the only</p> <p>4 person that you would talk to about Eastern</p> <p>5 Profit, about its business, was Guo Wengui.</p> <p>6 Since your first deposition, have you</p> <p>7 gone back to Guo Wengui to learn more about what</p> <p>8 Eastern profit does?</p> <p>9 A You're asking from the -- my first</p> <p>10 deposition until now?</p> <p>11 Q Correct.</p> <p>12 A I don't remember that. Probably no.</p> <p>13 Q When you spoke with Guo Mei, Guo's</p> <p>14 daughter, did you ask her what Eastern Profit</p> <p>15 does?</p> <p>16 A Yes, I did.</p> <p>17 Q What did she say?</p> <p>18 A Investment.</p> <p>19 Q The same thing her dad told you</p> <p>20 before; right?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A I don't remember the dad told me</p> <p>23 what. If you want me to read something, I can. I</p> <p>24 don't remember.</p> <p>25 Q Does it do investments on behalf of</p> <p style="text-align: right;">Page 78</p>	<p>1 YVETTE WANG</p> <p>2 That would be the similar question if</p> <p>3 I ask you, Eddie, are you comfortable to work with</p> <p>4 a client who has a reputation always failed to pay</p> <p>5 legal fee, and now suddenly you already know that</p> <p>6 before you who were not paid, you're still comfort</p> <p>7 to believe work for this client.</p> <p>8 That would be the same answer I will</p> <p>9 give you.</p> <p>10 Q Fair enough.</p> <p>11 Did someone at Eastern Profit tell</p> <p>12 you that they wanted you to be the corporate</p> <p>13 representative for purposes of this deposition?</p> <p>14 MS. CLINE: I'm going to object</p> <p>15 to the extent the decision as to who</p> <p>16 would be the rep was probably one</p> <p>17 that was conducted with counsel.</p> <p>18 So they said that the answer to</p> <p>19 that question calls for -- in any</p> <p>20 conversations you had with an</p> <p>21 attorney, you are instructed not to</p> <p>22 answer it.</p> <p>23 Q We're on the same page on that. I</p> <p>24 don't want to hear what any attorney told you.</p> <p>25 I want to know whether an actual</p> <p style="text-align: right;">Page 80</p>
<p>1 YVETTE WANG</p> <p>2 clients? Let me ask that question.</p> <p>3 Does it have compliance whose money</p> <p>4 it manages?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A As a normal professional investment</p> <p>7 business, I believe or I guess, yes.</p> <p>8 Q Do you know that, or is that just</p> <p>9 your guess?</p> <p>10 A My guess.</p> <p>11 Q Are you comfortable speaking as the</p> <p>12 representative of an entity for which you don't</p> <p>13 know what its normal business is?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 Mischaracterizes her testimony.</p> <p>16 She's answered your question.</p> <p>17 Again, the Judge said that your</p> <p>18 inquiry or your quick-sided quest to</p> <p>19 go figure out whether or not this</p> <p>20 company is, in quote, a shelf company</p> <p>21 in your words, is out of bounds, as</p> <p>22 is the subject of whether it has</p> <p>23 independent financial identity.</p> <p>24 A What's the question? Oh, yeah, I</p> <p>25 remember now.</p> <p style="text-align: right;">Page 79</p>	<p>1 YVETTE WANG</p> <p>2 living, breathing person with Eastern Profit told</p> <p>3 you that they wanted you to be the 30(b)(6)</p> <p>4 corporate rep?</p> <p>5 MS. CLINE: I object to the form</p> <p>6 of that question and repeat my</p> <p>7 instruction to you.</p> <p>8 So if you can answer it without</p> <p>9 talking about a conversation with the</p> <p>10 attorneys, then you may answer. But</p> <p>11 if it involves a conversation with</p> <p>12 attorneys, you should explain that.</p> <p>13 A You made me forget my question again.</p> <p>14 What's the question?</p> <p>15 Q Did any non-lawyer representative of</p> <p>16 Eastern Profit tell you that they wanted you to be</p> <p>17 the corporate representative for purposes of this</p> <p>18 deposition?</p> <p>19 A For this deposition; right?</p> <p>20 Q Right.</p> <p>21 A Yeah, my lawyer told me.</p> <p>22 Q No. Stop. I don't want to know what</p> <p>23 your lawyer told you.</p> <p>24 I want to know if a nonlawyer, who</p> <p>25 was a representative of Eastern Profit, it could</p> <p style="text-align: right;">Page 81</p>

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 be Guo Mei, it could be Han Chunguang, could be</p> <p>3 somebody else we don't know about yet, told you</p> <p>4 that they want you to be the corporate</p> <p>5 representative for this 30(b)(6)?</p> <p>6 MS. CLINE: Independent of any</p> <p>7 conversation with counsel in which</p> <p>8 counsel was included.</p> <p>9 Q Well, I don't want to know what</p> <p>10 counsel said. Just because counsel was there</p> <p>11 doesn't mean it's privileged.</p> <p>12 I want to know what natural person</p> <p>13 with Eastern Profit has told you that you're going</p> <p>14 to be the 30(b)(6) representative.</p> <p>15 MS. CLINE: I object to the form</p> <p>16 of the question, as well as I'm going</p> <p>17 to say if the decision as who would</p> <p>18 be the 30(b)(6) witness was involving</p> <p>19 counsel, I don't want you to answer</p> <p>20 the question.</p> <p>21 A I was told by both the director and</p> <p>22 the representative of Eastern saying that they</p> <p>23 want me to deal with all of this.</p> <p>24 Q Okay. We talked about two</p> <p>25 discussions, one with Mei Guo, with Mr. Han</p> <p style="text-align: right;">Page 82</p>	<p>1 YVETTE WANG</p> <p>2 A I don't remember I did that.</p> <p>3 Q You helped prepare Mr. Han for his</p> <p>4 deposition; didn't you?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A I don't remember I did that.</p> <p>7 Q Is it your testimony that you did not</p> <p>8 meet with Mr. Han -- let me be very clear.</p> <p>9 Is it your testimony that you did not</p> <p>10 confer with Mr. Han in advance of his deposition</p> <p>11 about his testimony?</p> <p>12 A What do you mean confer?</p> <p>13 Q Talk.</p> <p>14 A I don't remember I did.</p> <p>15 Q So your testimony is that before</p> <p>16 Mr. Han's deposition, you did not talk with him</p> <p>17 about his deposition?</p> <p>18 A I don't remember that.</p> <p>19 Q I mean Lianchao Han, just to be</p> <p>20 clear.</p> <p>21 A I know who you're talking about.</p> <p>22 Q Okay. And you talked to Mr. Han</p> <p>23 during breaks in the deposition; didn't you?</p> <p>24 A Yes, I did.</p> <p>25 Q You talked with him about the case;</p> <p style="text-align: right;">Page 84</p>
<p>1 YVETTE WANG</p> <p>2 Chunguang, did you speak with any other person to</p> <p>3 gain information about Eastern Profit since your</p> <p>4 last deposition?</p> <p>5 A Any other person; right?</p> <p>6 Q Mm-hmm.</p> <p>7 A My lawyers.</p> <p>8 Q Other than your lawyers.</p> <p>9 A I don't remember I did.</p> <p>10 Q How about Lianchao Han?</p> <p>11 A About what?</p> <p>12 Q About this case.</p> <p>13 A You asked me about Eastern Profits,</p> <p>14 and then you asked me about this case. You have</p> <p>15 two question.</p> <p>16 Q How about this. Let's do this. Have</p> <p>17 you talked to Lianchao Han about this case since</p> <p>18 your last deposition?</p> <p>19 A I don't remember that. Oh, except</p> <p>20 his deposition. You remember? That was probably</p> <p>21 the only time I met him since my first deposition.</p> <p>22 Q And you talked to him before his</p> <p>23 deposition; didn't you?</p> <p>24 A About what?</p> <p>25 Q About the case.</p> <p style="text-align: right;">Page 83</p>	<p>1 YVETTE WANG</p> <p>2 didn't you?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A I don't remember I did that.</p> <p>5 Q You talked to him about his</p> <p>6 testimony; didn't you?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A I don't remember I did that.</p> <p>9 Q Are you saying you don't remember or</p> <p>10 that you didn't do it?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 Beyond the scope of this 30(b)(6)</p> <p>13 deposition.</p> <p>14 Is there a question pending?</p> <p>15 MR. GREIM: There is.</p> <p>16 A What's the question?</p> <p>17 Q Is it that you don't remember, or you</p> <p>18 didn't do it?</p> <p>19 MS. CLINE: Same objection.</p> <p>20 A I don't remember and I didn't do</p> <p>21 that.</p> <p>22 Q What about Mr. Guo, did you talk with</p> <p>23 Mr. Guo between your last deposition and today</p> <p>24 about this case?</p> <p>25 A I don't remember.</p> <p style="text-align: right;">Page 85</p>

22 (Pages 82 to 85)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q Did you ask him any questions about</p> <p>3 Eastern Profit?</p> <p>4 A I don't remember that.</p> <p>5 Q Did you ask him any questions about</p> <p>6 the allegations and defenses in this case?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A I don't remember that.</p> <p>9 Q Again, you've been saying I don't</p> <p>10 remember. I'm going to be clear.</p> <p>11 Are you saying you might have, but</p> <p>12 you can't remember, or are you saying you did not</p> <p>13 do it?</p> <p>14 A I just don't remember whether I did</p> <p>15 that or not.</p> <p>16 Q What about Karen Maistrello, did you</p> <p>17 talk with her in preparation?</p> <p>18 MR. GREIM: I would ask that the</p> <p>19 side commentary from the corporate</p> <p>20 representative needs to stop. This</p> <p>21 is disrupting the deposition. I</p> <p>22 would ask the side commentary from</p> <p>23 Mr. Podhaskie to stop.</p> <p>24 MR. PODHASKIE: Can you tell me</p> <p>25 what topic of your --</p> <p style="text-align: right;">Page 86</p>	<p>1 YVETTE WANG</p> <p>2 Q I'm trying to determine -- it sounds</p> <p>3 like you've talked to exactly two people since</p> <p>4 your last deposition on these topics, Mei Guo and</p> <p>5 Mr. Han Chunguang.</p> <p>6 And it was not -- for purposes of</p> <p>7 preparation, it was just about the case, and</p> <p>8 you're drawing on some of the information.</p> <p>9 So I'm trying to find out whether any</p> <p>10 of the other people -- whether you've spoken with</p> <p>11 any of the other people, many of whom who have</p> <p>12 been witnesses whose depositions you sat and</p> <p>13 attended.</p> <p>14 So I'm asking: Did you talk with</p> <p>15 Miss Maistrello, let's limit it, about any of the</p> <p>16 topics that you are to testify about today?</p> <p>17 A You talked too much. What is the</p> <p>18 question?</p> <p>19 Q Since your deposition in January,</p> <p>20 have you talked with Miss Maistrello about any of</p> <p>21 the topics about which you are here to testify</p> <p>22 today?</p> <p>23 A No, I didn't.</p> <p>24 Q Since your last deposition, have you</p> <p>25 talked to William Yu about any of the topics about</p> <p style="text-align: right;">Page 88</p>
<p>1 YVETTE WANG</p> <p>2 MR. GREIM: This needs to stop.</p> <p>3 This is disrupting the deposition. I</p> <p>4 would ask the side commentary from</p> <p>5 Mr. Podhaskie to stop.</p> <p>6 This is the second deposition</p> <p>7 that its happened. If it happens</p> <p>8 again, we'll call the court.</p> <p>9 MR. PODHASKIE: Call the judge.</p> <p>10 Call her right now.</p> <p>11 Q Let me ask you, have you had any</p> <p>12 discussions with Miss Maistrello about this case</p> <p>13 between your last deposition and today?</p> <p>14 MS. CLINE: I'm going to object.</p> <p>15 I guess you're entitled to ask</p> <p>16 foundation questions about a</p> <p>17 preparation for this deposition. But</p> <p>18 a fishing expedition about what</p> <p>19 conversation she had with any witness</p> <p>20 in the case is just beyond the scope.</p> <p>21 You're just harassing her now.</p> <p>22 The judge limited the scope of</p> <p>23 questions. Now you're just rehashing</p> <p>24 witnesses who have already been</p> <p>25 deposed and going fishing.</p> <p style="text-align: right;">Page 87</p>	<p>1 YVETTE WANG</p> <p>2 which you are to testify about today?</p> <p>3 MS. CLINE: Objection. So you</p> <p>4 and I negotiated a deal where with</p> <p>5 regard to ACA you're permitted to ask</p> <p>6 about the negotiations of the loan,</p> <p>7 whether or not there have been</p> <p>8 payments made, whether or not they</p> <p>9 were expected to be made, and whether</p> <p>10 or not there was going to be</p> <p>11 interest. You asked those questions.</p> <p>12 Now you're going after</p> <p>13 conversations she may or may not have</p> <p>14 had with Maistrello and Mr. G, and</p> <p>15 it's beyond the scope of what you and</p> <p>16 I negotiated.</p> <p>17 MR. GREIM: No. These are the</p> <p>18 people who would have the</p> <p>19 information. There is no other</p> <p>20 actual Eastern Profit person. And</p> <p>21 the two people she spoke with, it was</p> <p>22 a pretty limited discussion.</p> <p>23 So William Je would be the</p> <p>24 person who would be able to talk</p> <p>25 about the negotiations. She just</p> <p style="text-align: right;">Page 89</p>

23 (Pages 86 to 89)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG 2 talked about one discussion with him. 3 I'm going to see if there's been 4 any follow up since her last 5 deposition. 6 MS. CLINE: Again, I object to 7 the form of the question. Mr. G is 8 with ACA. You're asking her about 9 her testimony and her capacity as a 10 30(b)(6) for Eastern Profit. 11 The scope of whatever went on at 12 ACA and who was in charge of it and 13 its directors is specifically beyond 14 the scope of this deposition. 15 Q Are you here to testify today about 16 any information that you've gained from William Je 17 about the ACA loan? 18 MS. CLINE: Objection to the 19 form. 20 A I'm here to testify today for the 21 order which you guys obtained October 28th, and in 22 my understanding, that should be the topic on that 23 list. 24 Q Have you talked to William Je about 25 any of those topics since your deposition?</p> <p style="text-align: right;">Page 90</p>	<p>1 YVETTE WANG 2 and I don't understand. I keep that topic in my 3 mind. I refer the topics on October 28th, 2019 4 order. And you went back to ask me about my first 5 deposition, which is 10 month from now. 6 My answer to you is I don't remember. 7 Too long time. 8 Q Okay. Have you talked to William Je 9 about the ACA loan since January, 2019? 10 A He mentioned that to me. 11 Q Okay. When was that? 12 A This year. 13 Q Okay. When this year? 14 A I don't remember clearly. 15 Q Was that after your first deposition? 16 A Yes. 17 Q Was it in the summer? 18 A I don't remember that. It should be 19 early summer or spring. Something. 20 Q So is it before your discussion with 21 Guo Mei? 22 A I believe, yes. 23 Q What did he tell you? 24 A He asked what is going on with the 25 lawsuit. When we can or we can get money back.</p> <p style="text-align: right;">Page 92</p>
<p>1 YVETTE WANG 2 A What topics? 3 Q The topics you just mentioned, you 4 said you understand you're here on an order on 5 certain topics. 6 Have you talked to William Je about 7 any of those topics since January, 2019? 8 A Eddie, you are confusing me again. 9 We have a two list of topics; right, my first 10 deposition and the second one. 11 Which one are you referring to? 12 Q My question was clear. I'm going to 13 repeat it. 14 You just told us you understand that 15 you're here on certain topics pursuant to the 16 court order. 17 A Which one? 18 Q Now keep those topics in mind, the 19 ones you just mentioned to me. Keep them in mind. 20 Now I'm going to ask you whether you 21 spoke with William Je about any of those topics 22 after your first deposition? 23 MS. CLINE: Objection to the 24 form. 25 A Okay. Don't feel I'm a foreigner,</p> <p style="text-align: right;">Page 91</p>	<p>1 YVETTE WANG 2 And it has been like closed one year. The loan 3 should be paid back. 4 So they are pushing. They have to 5 get the money back, otherwise the interest will be 6 huge. 7 Q Did he tell you what the interest 8 was? 9 A Two percent per month. 10 Q But did William Je tell you what the 11 interest was? 12 A Yeah. He mentioned that to me also. 13 Q When did you finally see a copy of 14 the loan agreement? 15 A I don't remember that. 16 Q Well, ultimately it was given to us 17 in this case. You didn't have it at your 18 deposition. 19 And so my question is: Who showed it 20 to you for the first time? 21 A Lawyer. 22 Q Who? 23 A Zach, I believe. 24 Q That's your prior counsel? 25 A Yes.</p> <p style="text-align: right;">Page 93</p>

24 (Pages 90 to 93)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q Have you discussed the loan document</p> <p>3 with any other representative of Eastern Profit?</p> <p>4 A I don't remember that.</p> <p>5 Q Have you asked them whether it is</p> <p>6 genuine?</p> <p>7 MS. CLINE: Objection.</p> <p>8 A Whether it is what?</p> <p>9 Q Whether it is genuine.</p> <p>10 MS. CLINE: Objection.</p> <p>11 A What do you mean genuine?</p> <p>12 Q Whether it is what it purports to be.</p> <p>13 A I still don't understand your</p> <p>14 question. Purport to be, you mean what?</p> <p>15 Q Is it a real loan document signed by</p> <p>16 ACA and Eastern Profit?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Okay. Back to your question. You</p> <p>19 answer my question.</p> <p>20 What is your question of this?</p> <p>21 Q Have you asked anyone at Eastern</p> <p>22 Profit whether it is genuine?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A Why should I ask? I don't remember</p> <p>25 asking. This is a normal, normal business law</p> <p style="text-align: right;">Page 94</p>	<p>1 YVETTE WANG</p> <p>2 he actually signed it?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A He told me.</p> <p>5 Q Okay.</p> <p>6 A Mm-hmm.</p> <p>7 Q When did he tell you this?</p> <p>8 A In our conversation.</p> <p>9 Q Which conversation?</p> <p>10 A The conversation in the lobby.</p> <p>11 Q This is the conversation at the end</p> <p>12 of the summer?</p> <p>13 A Yes.</p> <p>14 Q Did you have a copy of the loan</p> <p>15 agreement in front of you at the time?</p> <p>16 A You mean when I was talking with him;</p> <p>17 right?</p> <p>18 Q Yes.</p> <p>19 A Nope.</p> <p>20 Q Have you asked whether anyone</p> <p>21 witnessed his signature?</p> <p>22 A What's the question?</p> <p>23 Q Have you asked -- let me be clear.</p> <p>24 Have you asked Mr. Han whether anyone</p> <p>25 else was present when he signed it?</p> <p style="text-align: right;">Page 96</p>
<p>1 YVETTE WANG</p> <p>2 agreement.</p> <p>3 Q How do you know?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A As a law agreement you have lender,</p> <p>6 you have borrower, you have term, you have</p> <p>7 interest and drafted, I believe, by lawyers, I</p> <p>8 believe. So this is what I believe.</p> <p>9 Q Why do you believe it was drafted by</p> <p>10 lawyers?</p> <p>11 A This is my guess.</p> <p>12 MS. CLINE: Don't guess.</p> <p>13 THE WITNESS: Okay.</p> <p>14 A Very simple. Mr. Han doesn't speak</p> <p>15 English and write English at all.</p> <p>16 Q Do you know whether Mr. Han actually</p> <p>17 signed it?</p> <p>18 A Yes.</p> <p>19 Q How?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A You mean by pen?</p> <p>22 Q How do you know Mr. Han signed it?</p> <p>23 A Oh. Because I saw the law agreement.</p> <p>24 There was signature on there.</p> <p>25 Q Have you ever asked Mr. Han whether</p> <p style="text-align: right;">Page 95</p>	<p>1 YVETTE WANG</p> <p>2 A I didn't ask that.</p> <p>3 Q Have you asked Mr. Je or Yu whether</p> <p>4 anyone else was present when he signed it?</p> <p>5 A I did not ask that.</p> <p>6 Q How do you know Mr. Yu signed it?</p> <p>7 Let me step. Do you know Mr. Yu</p> <p>8 signed it?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 Object to the whole line of</p> <p>11 questioning.</p> <p>12 A So from the paper which Zack showed</p> <p>13 me. Z-A-C-K.</p> <p>14 MS. CLINE: I want to make sure</p> <p>15 you don't talk about anything that</p> <p>16 Zack told you, so be careful.</p> <p>17 THE WITNESS: Okay.</p> <p>18 A The law agreement was signed by both</p> <p>19 lender and borrower.</p> <p>20 (Wang Exhibit 31, a Loan</p> <p>21 Agreement Bates stamped</p> <p>22 Eastern-000278 to 280 previously</p> <p>23 marked for Identification as of this</p> <p>24 date.)</p> <p>25 Q I'm going to hand you what we're</p> <p style="text-align: right;">Page 97</p>

25 (Pages 94 to 97)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 marking Wang 31. I have a blank one for you</p> <p>3 hand to your counsel next door.</p> <p>4 MS. CLINE: So the Notice of</p> <p>5 Deposition that you marked first,</p> <p>6 which was the exhibit number.</p> <p>7 MR. GREIM: 30. We started in</p> <p>8 the 30s for some reason. I'm not</p> <p>9 sure why.</p> <p>10 Q So let me ask you first. Have you</p> <p>11 seen this document before?</p> <p>12 A Yes.</p> <p>13 Q Is this the document Mr. Grendi</p> <p>14 (phonetic) showed you?</p> <p>15 A Yes.</p> <p>16 Q When he showed it to you, was it the</p> <p>17 first time you had seen it?</p> <p>18 MS. CLINE: Objection. Asked</p> <p>19 and answered.</p> <p>20 A The hard copy, yes.</p> <p>21 Q Well, had you seen it in some</p> <p>22 electronic version beforehand?</p> <p>23 A No.</p> <p>24 Q You qualified your answer was in hard</p> <p>25 copy. I'm just asking did you see it in some</p> <p style="text-align: right;">Page 98</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Again, the same</p> <p>3 caution. I don't want you to testify</p> <p>4 about any conversations you had with</p> <p>5 Zack.</p> <p>6 Mr. Greim is trying to figure</p> <p>7 out if the first time you saw it is</p> <p>8 when Zack gave it to you or if there</p> <p>9 was another time.</p> <p>10 Q When you say from Zack's file, what</p> <p>11 do you mean Zack's file?</p> <p>12 A I don't remember that. Zack's file,</p> <p>13 I mean Zack showed me or not. What he tell me, I</p> <p>14 cannot remember that.</p> <p>15 Q I'm not asking you for right now what</p> <p>16 he told you. I'm asking when you say from Zack's</p> <p>17 file, what file are you referring to?</p> <p>18 A This agreement.</p> <p>19 Q Did he give it to you in person?</p> <p>20 A I don't remember that.</p> <p>21 Q Did he E-mail it to you?</p> <p>22 A I don't remember that.</p> <p>23 Q Was it part of a larger set of</p> <p>24 documents?</p> <p>25 MS. CLINE: That's a yes or no</p> <p style="text-align: right;">Page 100</p>
<p>1 YVETTE WANG</p> <p>2 other format before Mr. Grendi showed it to you?</p> <p>3 A I understand your question. I just a</p> <p>4 hundred percent tell you what did I see before.</p> <p>5 Q I don't think I understand your</p> <p>6 answer. I will ask you again.</p> <p>7 I understand that you had not seen --</p> <p>8 when you say in hard copy, are you telling me that</p> <p>9 this is the first time you saw the loan agreement</p> <p>10 in paper form?</p> <p>11 A Nope.</p> <p>12 Q Was it the first time you had seen a</p> <p>13 loan agreement at all?</p> <p>14 A No.</p> <p>15 Q When did you first see the loan</p> <p>16 agreement?</p> <p>17 A You mean this one?</p> <p>18 Q When did you first see a loan</p> <p>19 agreement between ACA and Eastern Profit?</p> <p>20 A I don't remember that.</p> <p>21 Q But it was sometime before Mr. Grendi</p> <p>22 showed you what we've marked as Wong Exhibit 31?</p> <p>23 A I don't remember that. I saw this</p> <p>24 agreement from Zack's file.</p> <p>25 Q From his file, what do you mean?</p> <p style="text-align: right;">Page 99</p>	<p>1 YVETTE WANG</p> <p>2 question. I don't want to get into</p> <p>3 which documents Mr. Grendi might have</p> <p>4 given you.</p> <p>5 A Yes.</p> <p>6 Q Were the other documents drafts of</p> <p>7 the loan agreement?</p> <p>8 A Sorry. What's the question?</p> <p>9 Q Were the other documents drafts of</p> <p>10 the loan agreement?</p> <p>11 A I don't understand the question.</p> <p>12 MS. CLINE: It's just a yes or</p> <p>13 no question.</p> <p>14 Q I will be clear.</p> <p>15 Do you understand the idea of a draft</p> <p>16 of a document, what a draft is?</p> <p>17 A Draft to me which means a draft</p> <p>18 without signature. Am I right?</p> <p>19 Q Yes. Yes.</p> <p>20 So were the other documents drafts of</p> <p>21 this loan agreement?</p> <p>22 A No. What I see from Zack or saw from</p> <p>23 Zack.</p> <p>24 MS. CLINE: I don't want you</p> <p>25 to -- he's only asking about the loan</p> <p style="text-align: right;">Page 101</p>

26 (Pages 98 to 101)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 agreement. If the documents were</p> <p>3 something other than versions of the</p> <p>4 loan agreement, I don't want you to</p> <p>5 answer the question.</p> <p>6 A I never saw any draft of this</p> <p>7 agreement. When I saw it, it's a completed</p> <p>8 agreement already finished.</p> <p>9 Q You testified at your first</p> <p>10 deposition that you first heard of ACA after a</p> <p>11 liar went from ACA to Strategic Vision. Do you</p> <p>12 recall that?</p> <p>13 A I don't remember that.</p> <p>14 Q Let's take me a second. I will point</p> <p>15 you to that, because I want to be very clear about</p> <p>16 this.</p> <p>17 Here we go. I'm going to slide over</p> <p>18 to you a final copy of your deposition from</p> <p>19 January 31, 2019.</p> <p>20 A Yes.</p> <p>21 Q I don't have a whole bunch of print</p> <p>22 offs of these, but I assume that everybody -- let</p> <p>23 me ask you.</p> <p>24 Did you review your old testimony in</p> <p>25 preparation for today?</p> <p style="text-align: right;">Page 102</p>	<p>1 YVETTE WANG</p> <p>2 read it.</p> <p>3 MR. GREIM: But I don't want to</p> <p>4 loose my spot.</p> <p>5 Q Did I read the first few lines</p> <p>6 correctly?</p> <p>7 A Yes.</p> <p>8 Q Let's take a pause. Read through</p> <p>9 whatever you need to read there on that page to</p> <p>10 see what else to get context.</p> <p>11 A You want me to read until which page?</p> <p>12 Q There's a long discussion about why</p> <p>13 the money was wired, which is not what my question</p> <p>14 is about.</p> <p>15 I'm asking you about the answer you</p> <p>16 gave on lines 20 through -- question and answer on</p> <p>17 lines 20 through 23.</p> <p>18 Have you had a chance to get to</p> <p>19 line 20 to 23 yet on page 40?</p> <p>20 A Yes, I'm here.</p> <p>21 Q So the attorney asked you prior to</p> <p>22 them wiring a million dollars to Strategic Vision,</p> <p>23 you had never heard of ACA Capital. Answer: No,</p> <p>24 I didn't.</p> <p>25 Did I read that right?</p> <p style="text-align: right;">Page 104</p>
<p>1 YVETTE WANG</p> <p>2 A I didn't.</p> <p>3 Q Look at page 40, please. Are you</p> <p>4 there yet?</p> <p>5 A Page 40, right?</p> <p>6 Q Mm-hmm.</p> <p>7 A Yes, I'm here.</p> <p>8 Q So look at line 6. You see there's a</p> <p>9 que there. That's the question of the other</p> <p>10 lawyer, it wasn't me, who was asking you</p> <p>11 questions.</p> <p>12 You see it says: The entity ACA</p> <p>13 Capital Group Limited, are you with that?</p> <p>14 Answer: I heard this name.</p> <p>15 Question: How did you hear this</p> <p>16 name?</p> <p>17 Answer, from this project.</p> <p>18 MS. CLINE: Let me just</p> <p>19 interrupt. The witness needs a</p> <p>20 minute to read some more of the</p> <p>21 transcript for context.</p> <p>22 You should feel free.</p> <p>23 MR. GREIM: Let's do that.</p> <p>24 Q So far did I read it correctly?</p> <p>25 MS. CLINE: Give her a minute to</p> <p style="text-align: right;">Page 103</p>	<p>1 YVETTE WANG</p> <p>2 A Correct.</p> <p>3 Q So you recall now testifying at your</p> <p>4 first deposition that you had not heard of ACA</p> <p>5 before the wire went to Strategic Vision?</p> <p>6 A You're repeating what we said here;</p> <p>7 right?</p> <p>8 Q Correct. Do you recall testifying to</p> <p>9 that at your first deposition?</p> <p>10 A Yes.</p> <p>11 Q Is that true? I mean is it true that</p> <p>12 you had not learned -- you have not heard of ACA</p> <p>13 capital until the money was wired to Strategic</p> <p>14 Vision?</p> <p>15 A Correct.</p> <p>16 Q That's all I wanted to ask you.</p> <p>17 So now I'm going to come back to this</p> <p>18 agreement. When is the first time that you sought</p> <p>19 any kind of writing, not necessarily Exhibit 31,</p> <p>20 but any kind of writing that contained the terms</p> <p>21 of the loan agreement?</p> <p>22 MS. CLINE: Asked and answered.</p> <p>23 A You mean any draft without any</p> <p>24 signature?</p> <p>25 Q Sure.</p> <p style="text-align: right;">Page 105</p>

27 (Pages 102 to 105)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A No, I didn't.</p> <p>3 Q Okay. What about an E-mail or any</p> <p>4 other writing where the terms of the loan were</p> <p>5 discussed, did you see anything like that before</p> <p>6 Mr. Grendi showed you this loan agreement,</p> <p>7 Exhibit 31?</p> <p>8 A You mean did I see any terms in</p> <p>9 E-mail?</p> <p>10 Q Or in any other kind of writing.</p> <p>11 A No, I didn't.</p> <p>12 Q Do you know where Mr. Grendi got the</p> <p>13 loan agreement?</p> <p>14 MS. CLINE: That's a yes or no</p> <p>15 question. I just want to be careful</p> <p>16 about it.</p> <p>17 Q We'll try carefully.</p> <p>18 Do you know where Mr. Grendi got the</p> <p>19 loan agreement before he gave it to you?</p> <p>20 A I don't know.</p> <p>21 Q Have you ever asked anyone at Eastern</p> <p>22 Profit who was keeping this copy, who was keeping</p> <p>23 a copy of the loan agreement?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A I don't remember that.</p> <p style="text-align: right;">Page 106</p>	<p>1 YVETTE WANG</p> <p>2 communications about the loan agreement in it?</p> <p>3 A You're asking the possibility; right?</p> <p>4 Q Of Eastern Profit about its own</p> <p>5 files, yes.</p> <p>6 A Possible.</p> <p>7 Q Who searched for this; do you know?</p> <p>8 Who searched for the loan agreement?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A I didn't ask.</p> <p>11 Q Did you?</p> <p>12 A I don't remember that.</p> <p>13 Q Did you ask somebody else to search</p> <p>14 for the loan agreement?</p> <p>15 A I don't remember that.</p> <p>16 Q Han Chunguang, does he keep a copy of</p> <p>17 the loan agreement?</p> <p>18 A I didn't ask. He should.</p> <p>19 Q Why do you say he should?</p> <p>20 A Because he told me there's a loan</p> <p>21 agreement.</p> <p>22 Q Did he tell you he had his own copy?</p> <p>23 A I don't remember.</p> <p>24 Q Did he tell you when he signed it?</p> <p>25 A By December, 2017. Yeah, by</p> <p style="text-align: right;">Page 108</p>
<p>1 YVETTE WANG</p> <p>2 Q You mean so you may have asked</p> <p>3 somebody, or you don't remember whether you did or</p> <p>4 did not?</p> <p>5 A I don't remember I asked or I didn't.</p> <p>6 Q Who at Eastern Profit keeps records</p> <p>7 of things like loan agreements?</p> <p>8 A What's the question?</p> <p>9 Q Who at Eastern Profit keeps records</p> <p>10 of things like loan agreements?</p> <p>11 A Usually the company registration</p> <p>12 documents. Like Hong Kong company, they are</p> <p>13 managed by secretary.</p> <p>14 Q So did Eastern Profit's secretary</p> <p>15 keep a copy of this loan agreement?</p> <p>16 A I didn't say that.</p> <p>17 Q You're just saying what you think is</p> <p>18 normally true?</p> <p>19 A I didn't ask and I don't know.</p> <p>20 Q Does Eastern Profit have anyone who</p> <p>21 keeps records of the loan agreement or</p> <p>22 correspondence with ACA about the loan agreement?</p> <p>23 A I didn't ask.</p> <p>24 Q Is it possible that Eastern Profit</p> <p>25 does have a file with the loan agreement and</p> <p style="text-align: right;">Page 107</p>	<p>1 YVETTE WANG</p> <p>2 December, 2017.</p> <p>3 Q But did he tell you? Let's look at</p> <p>4 page 1. Page 1 says --</p> <p>5 A That's right. December, 2017.</p> <p>6 Q It says it's made on the 29th of</p> <p>7 December of 2017; right?</p> <p>8 A Yes.</p> <p>9 Q My question to you is not what the</p> <p>10 loan agreement says. My question is: Did you ask</p> <p>11 Mr. Han, or did he tell you the day on which he</p> <p>12 affixed his signature to this document?</p> <p>13 A He told me he signed a loan agreement</p> <p>14 in December, 2017 for this Strategic Revision</p> <p>15 investigation project.</p> <p>16 Q When did he tell you that?</p> <p>17 A In the conversation.</p> <p>18 Q This is in the conference room at the</p> <p>19 end of the summer?</p> <p>20 A The lobby conference room.</p> <p>21 Q Okay. A couple of months ago he told</p> <p>22 you this?</p> <p>23 A Yes.</p> <p>24 Q Did you talk to William Je about</p> <p>25 whether he signed the agreement?</p> <p style="text-align: right;">Page 109</p>

28 (Pages 106 to 109)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection. Again,</p> <p>3 she's sitting here in her capacity as</p> <p>4 a representative of 30(b)(6) -- a</p> <p>5 30(b)(6) representative for Eastern</p> <p>6 Profit.</p> <p>7 You have yet to ask a single</p> <p>8 question about the contract that is</p> <p>9 the subject of this lawsuit.</p> <p>10 Now you're again asking</p> <p>11 questions about Mr. Je and ACA, which</p> <p>12 is specifically not within the scope</p> <p>13 of this deposition.</p> <p>14 So if we can just get to what</p> <p>15 we're actually litigating, that would</p> <p>16 be amazing.</p> <p>17 Q Did you ask Mr. Je about whether he</p> <p>18 signed this purported loan agreement from ACA to</p> <p>19 Eastern Profit?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A He told me he signed.</p> <p>22 Q When did he tell you that?</p> <p>23 A I don't remember that.</p> <p>24 Q Was it in 2019?</p> <p>25 A I believe it was in 2018. The</p> <p style="text-align: right;">Page 110</p>	<p>1 YVETTE WANG</p> <p>2 understand he's talking about ACA.</p> <p>3 Q But you didn't see this loan</p> <p>4 agreement until sometime in 2019 when Mr. Grendi</p> <p>5 gave it to you; correct?</p> <p>6 A I don't remember the time. Again, I</p> <p>7 told you I don't remember first time agreement.</p> <p>8 Q You testified at your deposition that</p> <p>9 you had asked for a copy of the loan agreement and</p> <p>10 hadn't gotten one.</p> <p>11 Do you remember that?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 Again if you want to show her</p> <p>14 testimony.</p> <p>15 MR. GREIM: We will.</p> <p>16 Q Turn to page 45, please. Are you</p> <p>17 there?</p> <p>18 A 45, yes.</p> <p>19 Q You see line 8 there is a question</p> <p>20 from the lawyer. He says: Is there documentation</p> <p>21 to support this loan? Answer: I requested there</p> <p>22 should be some documents. Question: Have you</p> <p>23 ever seen the documents supporting this loan</p> <p>24 answer? Answer: I didn't see that. Question:</p> <p>25 You did not see it? Answer: No.</p> <p style="text-align: right;">Page 112</p>
<p>1 YVETTE WANG</p> <p>2 dinner, that should be the first time he clearly</p> <p>3 told me, yes.</p> <p>4 Q So how did this come up that he</p> <p>5 signed it? Did you ask him or did he just</p> <p>6 volunteer that information?</p> <p>7 A He told me.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A He told me we sign a loan agreement.</p> <p>10 We had a loan agreement.</p> <p>11 Q So he told you two things. One, that</p> <p>12 there was a loan agreement, and two, that he had</p> <p>13 been the signer on behalf of the ACA?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A You remember my first deposition in</p> <p>16 January, 2019, I said I even didn't hear about ACA</p> <p>17 company. My dinner with William was by light</p> <p>18 2018, that dinner. William just told me they sign</p> <p>19 a loan agreement. He didn't even mention to me</p> <p>20 what company.</p> <p>21 Q What company he signed on behalf of?</p> <p>22 A Yes.</p> <p>23 Q Did you understand that it was ACA,</p> <p>24 or did you think it was maybe a different company?</p> <p>25 A When I saw this loan agreement and</p> <p style="text-align: right;">Page 111</p>	<p>1 YVETTE WANG</p> <p>2 Did I read that correctly?</p> <p>3 A Yes.</p> <p>4 Q Now do you recall testifying at your</p> <p>5 deposition that you had not seen a copy of the</p> <p>6 loan agreement?</p> <p>7 MS. CLINE: Objection to the</p> <p>8 form.</p> <p>9 A And you're helping yourself to answer</p> <p>10 your own question. By January, my first</p> <p>11 deposition, I testify I didn't see the law</p> <p>12 agreement which you're helping yourself. I saw</p> <p>13 this law agreement after my first deposition.</p> <p>14 Q Good. And so -- but you cannot tell</p> <p>15 us today when that was. Was it soon after the</p> <p>16 deposition, was it recently before Mr. Grendi left</p> <p>17 the case?</p> <p>18 A I don't remember.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A I don't remember that.</p> <p>21 Q Once you got the loan document, did</p> <p>22 you question Mr. Han Chunguang about it?</p> <p>23 A Question?</p> <p>24 Q Did you ask him questions about the</p> <p>25 document?</p> <p style="text-align: right;">Page 113</p>

29 (Pages 110 to 113)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A I don't remember that.</p> <p>3 Q Do you know who drafted it? Let me</p> <p>4 ask you a different question.</p> <p>5 Who drafted it? Who drafted the loan</p> <p>6 agreement?</p> <p>7 MS. CLINE: Asked and answered.</p> <p>8 You can answer.</p> <p>9 Objection. Asked and answered</p> <p>10 already.</p> <p>11 A I don't know.</p> <p>12 Q Did it go through multiple versions</p> <p>13 before it was signed?</p> <p>14 A I don't know.</p> <p>15 Q Who negotiated the agreement?</p> <p>16 A I heard it was discussed between</p> <p>17 William and Mr. Han.</p> <p>18 Q Who told you that?</p> <p>19 A Both of them.</p> <p>20 Q When did Han Chunguang tell you that</p> <p>21 he negotiated it with William Je?</p> <p>22 A I don't remember that.</p> <p>23 Q Was it in the late summer meeting</p> <p>24 with him?</p> <p>25 A Earlier? Earlier that meeting.</p> <p style="text-align: right;">Page 114</p>	<p>1 YVETTE WANG</p> <p>2 Q Why did Eastern Profit decide to</p> <p>3 approach ACA for a loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A What was the question?</p> <p>6 Q Why did Eastern Profit decide to</p> <p>7 approach ACA for a loan?</p> <p>8 A Because Eastern Profit bank account</p> <p>9 was frozen.</p> <p>10 Q Why did it choose ACA instead of some</p> <p>11 other entity?</p> <p>12 A I heard like William and Mr. Han,</p> <p>13 including their family, they were or they are</p> <p>14 prosecuted and threatened by Chinese Communist</p> <p>15 Party also. So to take down Chinese Communist</p> <p>16 Party is their same goal.</p> <p>17 Q Who told you this?</p> <p>18 A I heard this from both William and</p> <p>19 Mr. Han.</p> <p>20 Q When did Mr. Han tell you this?</p> <p>21 A Many times.</p> <p>22 Q He told you many times that he went</p> <p>23 to ACA for a loan because William Guo's family was</p> <p>24 also being persecuted?</p> <p>25 MS. CLINE: Objection to form.</p> <p style="text-align: right;">Page 116</p>
<p>1 YVETTE WANG</p> <p>2 Q And Mr. Yu told you that he had</p> <p>3 negotiated it on behalf of ACA?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A He didn't mention about ACA's name.</p> <p>6 Q He said that he had negotiated it</p> <p>7 and did not use the name ACA.</p> <p>8 A I don't remember that clearly.</p> <p>9 Q Let me ask you this.</p> <p>10 When did Eastern approach ACA for</p> <p>11 credit?</p> <p>12 MS. CLINE: Objection to form.</p> <p>13 A What's the question?</p> <p>14 Q When did Eastern approach ACA for</p> <p>15 credit?</p> <p>16 A What do you mean for credit?</p> <p>17 Q For a loan.</p> <p>18 A I heard it was like in December of</p> <p>19 2017.</p> <p>20 Q When in December of 2017?</p> <p>21 A You were asking the date?</p> <p>22 Q Yes.</p> <p>23 A I don't know.</p> <p>24 Q Did you ask Mr. Chunguang, Mr. Han?</p> <p>25 A I don't remember that.</p> <p style="text-align: right;">Page 115</p>	<p>1 YVETTE WANG</p> <p>2 I lodge an objection to the whole</p> <p>3 line of inquiry. Again, we agreed</p> <p>4 you could ask questions about the</p> <p>5 negotiations, the loan documents,</p> <p>6 interest payments and so forth of the</p> <p>7 the identity of the negotiator, which</p> <p>8 she's now testified to.</p> <p>9 As the court said in her opinion</p> <p>10 the court has expressed skepticism of</p> <p>11 this theory as you're pursuing it.</p> <p>12 And we've already negotiated the</p> <p>13 scope of appropriate questions, and</p> <p>14 you're going beyond it.</p> <p>15 This is just a wild goose chase</p> <p>16 as to a period the court has already</p> <p>17 rejected.</p> <p>18 Q Please answer the question.</p> <p>19 A Mr. Han mentioned many times his</p> <p>20 family, and himself, and his business are</p> <p>21 threatened and persecuted by Chinese communist</p> <p>22 party.</p> <p>23 Q And I understand that. My question</p> <p>24 is not how many times he's told you his family has</p> <p>25 been persecuted.</p> <p style="text-align: right;">Page 117</p>

30 (Pages 114 to 117)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 My question is: Has he actually told</p> <p>3 you that the reason that Eastern Profit went to</p> <p>4 ACA is because Mr. Han thought he had something in</p> <p>5 common with Mr. G?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Q That's what I want to know about.</p> <p>8 A Something in common; right? I</p> <p>9 think, Eddie, you're right.</p> <p>10 Q My question is has Mr. Han told you</p> <p>11 that? Has he told you that that is why Eastern</p> <p>12 Profit went to ACA for a loan?</p> <p>13 A Yes.</p> <p>14 Q Okay. How long did the negotiation</p> <p>15 last?</p> <p>16 A Negotiation about what?</p> <p>17 Q The terms of the loan.</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A Should not be very long. Quiet</p> <p>20 quickly.</p> <p>21 Q You say should not be. My question</p> <p>22 is was it?</p> <p>23 A What's your question?</p> <p>24 Q Did a negotiation take very long?</p> <p>25 A You're asking my personal knowledge</p> <p style="text-align: right;">Page 118</p>	<p>1 YVETTE WANG</p> <p>2 Is there another discussion that you</p> <p>3 recall having with Mr. Han about the loan?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A Yes.</p> <p>6 Q When? When was that?</p> <p>7 A End of -- I forgot that. I don't</p> <p>8 remember. Definitely not only one time.</p> <p>9 Q Was it after your first deposition?</p> <p>10 A Before and after. Both.</p> <p>11 Q How many times did you talk with him</p> <p>12 about the loan before your first deposition?</p> <p>13 A I don't remember that.</p> <p>14 Q How many times did you talk to him</p> <p>15 about the loan after your first deposition?</p> <p>16 A A couple of times.</p> <p>17 Q So the most recent was at the end of</p> <p>18 the summer; right?</p> <p>19 A Yes.</p> <p>20 Q There was some time before that that</p> <p>21 you -- that you also spoke to him about the loan?</p> <p>22 A About the entire case.</p> <p>23 Q And did that include the loan?</p> <p>24 A Yes.</p> <p>25 Q So how long did the -- did the</p> <p style="text-align: right;">Page 120</p>
<p>1 YVETTE WANG</p> <p>2 or my obtain knowledge?</p> <p>3 Q I'm asking what does Eastern Profit</p> <p>4 know about its negotiation with ACA? My question</p> <p>5 is how long did it take?</p> <p>6 MS. CLINE: Asked and answered.</p> <p>7 A Mr. Han mentioned to me he reached</p> <p>8 out to William asking for loan sharing the same</p> <p>9 targets investigate and disclosure the corrupted</p> <p>10 Chinese official. And they went through some</p> <p>11 discussion, which in my impression is normal, and</p> <p>12 they sign agreement.</p> <p>13 Q Okay. When did he tell you about</p> <p>14 these discussions?</p> <p>15 A When; right? Well, I don't remember</p> <p>16 that.</p> <p>17 Q Was the amount always going to be</p> <p>18 \$1 million? In other words, did the principle</p> <p>19 amount change during the negotiations?</p> <p>20 A I didn't hear about that.</p> <p>21 Q Did you ask Mr. Han?</p> <p>22 A No, I didn't.</p> <p>23 Q Just to be clear, I understand that</p> <p>24 you've had one discussion with Mr. Han about this</p> <p>25 loan, and that was at the end of the summer.</p> <p style="text-align: right;">Page 119</p>	<p>1 YVETTE WANG</p> <p>2 discussion last over a couple of days between</p> <p>3 Mr. Han and Mr. Yu, was it wrapped up in half an</p> <p>4 hour?</p> <p>5 How long did it take them to</p> <p>6 negotiate the loan agreement?</p> <p>7 MS. CLINE: Asked and answered.</p> <p>8 A I heard like a couple of days.</p> <p>9 Q I notice the interest is 2 percent</p> <p>10 per month, and it compounds monthly unless</p> <p>11 otherwise mutually agreed.</p> <p>12 Have the lender and borrower mutually</p> <p>13 agreed in writing since this loan agreement to</p> <p>14 remove the 2 percent interest per month</p> <p>15 compounding feature?</p> <p>16 A That's the question?</p> <p>17 Q Have the lender and borrower mutually</p> <p>18 agreed in writing since the date of this loan</p> <p>19 agreement to remove the 2 percent interest per</p> <p>20 month compounding term?</p> <p>21 A I never heard about this.</p> <p>22 Q Have they made any modifications to</p> <p>23 the loan agreement?</p> <p>24 A I didn't hear about this.</p> <p>25 Q Is it possible that they did?</p> <p style="text-align: right;">Page 121</p>

31 (Pages 118 to 121)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A I cannot guess. I don't know.</p> <p>3 Q Who would have the file that would</p> <p>4 show any modifications to the loan agreement?</p> <p>5 A You are -- Eddie you're asking based</p> <p>6 on imagination. If they ever modify, my guess --</p> <p>7 I know Joanna doesn't want me to guess, so that is</p> <p>8 between Mr. Han and William.</p> <p>9 Q Have you asked Mr. Han if there have</p> <p>10 been any modifications to the loan agreement?</p> <p>11 A I checked with him.</p> <p>12 Q Okay. When did you check with him?</p> <p>13 A I forgot the time when. But I</p> <p>14 remember asking him like roughly what is the term,</p> <p>15 what is interest. And then any other special</p> <p>16 things I should know, or any like change of mind I</p> <p>17 should know.</p> <p>18 Q So if I ask Eastern have there been</p> <p>19 any modifications to the loan agreement, the</p> <p>20 answer is no.</p> <p>21 Is it a firm no, or is it no, but</p> <p>22 there might have been?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A I believe it's a firm no.</p> <p>25 Q The 2 percent interest per month</p> <p style="text-align: right;">Page 122</p>	<p>1 YVETTE WANG</p> <p>2 was taken.)</p> <p>3 THE VIDEOGRAPHER: Good</p> <p>4 afternoon. The time is 2:05 p.m.,</p> <p>5 Wednesday, October 30, 2019. This is</p> <p>6 media number 3 of the videotaped</p> <p>7 deposition of Miss Yvette Wang. We</p> <p>8 are back on the record.</p> <p>9 CONTINUED EXAMINATION</p> <p>10 BY MR. GREIM:</p> <p>11 Q Miss Wang, welcome back. We'll</p> <p>12 return to the topic that we left with before our</p> <p>13 lunch break. That is the ACAEP loan.</p> <p>14 We were talking about the</p> <p>15 negotiations beforehand, and I did not ask you</p> <p>16 whether any of the negotiations occurred by</p> <p>17 E-mail. Did they?</p> <p>18 A You didn't ask me that question.</p> <p>19 Q Correct. Now I am.</p> <p>20 A I don't believe so.</p> <p>21 Q Have you searched for E-mails</p> <p>22 relevant to this topic?</p> <p>23 A My E-mails.</p> <p>24 Q Anyone's E-mails.</p> <p>25 A First --</p> <p style="text-align: right;">Page 124</p>
<p>1 YVETTE WANG</p> <p>2 compounding is a very high APR. You won't have to</p> <p>3 do the math here.</p> <p>4 But my question to you is: Why did</p> <p>5 Eastern Profit agree to such a high interest</p> <p>6 payment?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 A I don't think it's high.</p> <p>9 Q Okay. So Eastern Profit does not</p> <p>10 believe that 2 percent per month compounded</p> <p>11 annually is a high interest -- high interest term?</p> <p>12 A Correct.</p> <p>13 Q Has Eastern Profit ever asked ACA to</p> <p>14 lower the amount of the interest?</p> <p>15 A I didn't hear about that.</p> <p>16 MR. GREIM: Let's go ahead and</p> <p>17 take a break.</p> <p>18 THE VIDEOGRAPHER: The time is</p> <p>19 1:20 p.m., Wednesday, October 30,</p> <p>20 2019.</p> <p>21 This is the end of media number</p> <p>22 2 of the videotaped deposition of</p> <p>23 Yvette Wang.</p> <p>24 We're off the record.</p> <p>25 (At this time, a brief recess</p> <p style="text-align: right;">Page 123</p>	<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Let me interject</p> <p>3 here. The performance of the search</p> <p>4 in response to the RFPs was not a</p> <p>5 subject of the deposition notice.</p> <p>6 To the extent you know the</p> <p>7 answer to the question, you may</p> <p>8 answer.</p> <p>9 A First I searched in my E-mail.</p> <p>10 Nothing.</p> <p>11 Q But you weren't involved in the</p> <p>12 negotiation of the loan?</p> <p>13 A You mean before the loan agreement</p> <p>14 was signed; correct?</p> <p>15 Q Correct.</p> <p>16 A Oh. No, not really.</p> <p>17 Q Okay. So does Eastern Profit know</p> <p>18 whether Han Chunguang exchanged any E-mails with</p> <p>19 William Je or any other person about the ACA loan?</p> <p>20 A You're asking did Mr. Han exchange</p> <p>21 the E-mail about this loan; right?</p> <p>22 Q Right. Mm-hmm.</p> <p>23 A He told me the discussion was orally.</p> <p>24 Q How about texts?</p> <p>25 A Orally.</p> <p style="text-align: right;">Page 125</p>

32 (Pages 122 to 125)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q What, if any, was Guo Wengui's</p> <p>3 involvement in the discussion of the loan,</p> <p>4 negotiation of the loan?</p> <p>5 A I'm not quite clear about his role in</p> <p>6 this discussion.</p> <p>7 Q Well, was he acting as Eastern</p> <p>8 Profits' agent in connection with the loan</p> <p>9 negotiation?</p> <p>10 A Correct.</p> <p>11 Q Was he acting as Eastern Profit's</p> <p>12 agent -- let me strike that.</p> <p>13 Has he been the acting as Eastern</p> <p>14 Profit's agent in connection with discussions with</p> <p>15 ACA regarding payment or a collection of the loan?</p> <p>16 A I heard William mention to be paid</p> <p>17 back to Mr. Guo also.</p> <p>18 Q Where did you hear that?</p> <p>19 A From William.</p> <p>20 Q When did he tell you this?</p> <p>21 A I forgot the precise words, but my</p> <p>22 impression is he's chasing everyone he can chase.</p> <p>23 Q My question was when did William Je</p> <p>24 mention to you that he had talked to Guo about</p> <p>25 paying back the loan?</p> <p style="text-align: right;">Page 126</p>	<p>1 YVETTE WANG</p> <p>2 agent of Eastern Profit with respect to the loan?</p> <p>3 A I said Mr. Guo acted as an agent on</p> <p>4 behalf of Eastern Profit to talk with Strategic</p> <p>5 Vision and Waller and Wallop. W-A-L-L-E-R and</p> <p>6 W-A-L-L-O-P.</p> <p>7 Q I'm sorry. My question is about the</p> <p>8 loan, not about the discussions with Strategic</p> <p>9 Vision. I will be very clear.</p> <p>10 In fact, let me take a second.</p> <p>11 Does Mr. Guo have any E-mails or</p> <p>12 texts that he sent to Mr. Ye or anyone else on</p> <p>13 Eastern Profit's behalf in connection with the</p> <p>14 loan?</p> <p>15 A I don't believe so.</p> <p>16 Q Did Eastern Profit check for those</p> <p>17 E-mails or texts before the deposition today?</p> <p>18 MS. CLINE: Again, that was not</p> <p>19 a subject of the depo notice.</p> <p>20 If you know the answer, you may</p> <p>21 respond.</p> <p>22 A I asked about the loan agreement. I</p> <p>23 was advised they were our discussion.</p> <p>24 So I didn't change further and say</p> <p>25 let me search your E-mail or search your texts,</p> <p style="text-align: right;">Page 128</p>
<p>1 YVETTE WANG</p> <p>2 A Should be quite a long time. 2018.</p> <p>3 Q Is this in the 2018 dinner?</p> <p>4 A Yes. In a dinner he mentioned to me</p> <p>5 also, yeah.</p> <p>6 Q In a dinner or the dinner that we</p> <p>7 discussed earlier?</p> <p>8 A I believe we were talking about their</p> <p>9 dinner. I'm ready to tell you where is the</p> <p>10 restaurant.</p> <p>11 Q Where is the restaurant?</p> <p>12 A Avra.</p> <p>13 Q Spell that for the record.</p> <p>14 A A-V-R-A. It's a great seafood</p> <p>15 restaurant.</p> <p>16 Q Well, other than Guo and other than</p> <p>17 Han Chunguang, who else was involved in</p> <p>18 negotiation of the ACA Eastern Profit loan?</p> <p>19 A Mei is aware of this loan also.</p> <p>20 Q Well, you say she is aware. My</p> <p>21 question is who was involved in the negotiation of</p> <p>22 the loan?</p> <p>23 A Oh. Negotiation. William, Mr. Han.</p> <p>24 Yeah.</p> <p>25 Q You said Mr. Guo also acted as the</p> <p style="text-align: right;">Page 127</p>	<p>1 YVETTE WANG</p> <p>2 because I believe I was told the truth.</p> <p>3 Q Did you ask Mr. Guo that question?</p> <p>4 A I didn't ask him. I don't remember</p> <p>5 that.</p> <p>6 Q Now the research agreement called for</p> <p>7 a fee of \$750,000 a month; is that right?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A \$750,000, U.S. dollars, based on</p> <p>10 their weekly reports and general monthly reports.</p> <p>11 Without seeing or received the reports, \$750,000</p> <p>12 U.S. dollars should not be paid.</p> <p>13 Q What steps, if any, did Eastern</p> <p>14 Profit take to raise the money for the first</p> <p>15 \$750,000 payment to Strategic Vision?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Sorry. What's the question? Raised</p> <p>18 the money?</p> <p>19 Q Sure.</p> <p>20 A What's the question?</p> <p>21 Q What steps, if any, did Eastern</p> <p>22 Profit take to raise the money for the first</p> <p>23 \$750,000 payment to Strategic Vision?</p> <p>24 MS. CLINE: So hold your answer</p> <p>25 for a minute. Again, the Judge has</p> <p style="text-align: right;">Page 129</p>

33 (Pages 126 to 129)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG 2 already ruled that the independent 3 financial identity of Eastern Profit 4 is not appropriate, within the 5 appropriate scope of the deposition. 6 Q This goes to these loan agreements 7 and not to the independent financial identity. So 8 my question is: What was Eastern Profit? We saw 9 that it negotiated a loan for the million dollar 10 deposit. 11 What steps was it taking to make the 12 first \$750,000 payment? 13 MS. CLINE: No. I'm going to 14 object, and I'll quote from the 15 judge's order. "To the extent the 16 defendant seeks to inquire further 17 regarding plaintiff's financial 18 situation, his request to do so is 19 denied." 20 Again for failure to establish 21 relevance, this inquiry is beyond the 22 scope of the deposition. 23 Q Was Eastern Profit negotiating with 24 ACA for a second loan to make its first payment? 25 MS. CLINE: Some objection. The</p> <p style="text-align: right;">Page 130</p>	<p>1 YVETTE WANG 2 not know? 3 MS. CLINE: Objection to form. 4 A It's possible. 5 Q All right. Has ACA made a written 6 demand for payment on Eastern Profit? 7 A Written demand. I didn't see that by 8 myself. But I heard possibly, yes. 9 Q Has Eastern Profit received a written 10 demand from ACA for payment? 11 A I didn't check our records. 12 Q Who has the records? 13 A I assume Mr. Han. 14 Q Do you know whether he does? 15 A You're asking me to guess. 16 Q I'm asking Eastern Profit who keeps 17 it's financial records. 18 A You're asking financial records, or 19 you're asking the written demands? This is two 20 things to me added. 21 Q Who keeps Eastern Profit's financial 22 records? 23 A The company itself. 24 Q Which person keeps the financial 25 records?</p> <p style="text-align: right;">Page 132</p>
<p>1 YVETTE WANG 2 financial wherewithal or status of 3 the entity is beyond the scope. 4 MR. GREIM: It's not about the 5 financial wherewithal. It's about 6 whether it is truly and whether it 7 actually negotiated the first loan at 8 the relevant time. 9 Q So my question is: Was Eastern 10 Profit engaged with ACA in discussions for a 11 second loan to make the \$750,000 payment that was 12 due for the first month of the contract? 13 MS. CLINE: I repeat my 14 objection. That's beyond the scope 15 of the deposition. 16 Q I would like an answer to that 17 question. 18 THE WITNESS: Can I answer? 19 MS. CLINE: You can answer if 20 you know. 21 It's beyond the scope of what 22 the witness was asked to educate 23 herself on. 24 A It's possible. 25 Q So Eastern Profit might know. You do</p> <p style="text-align: right;">Page 131</p>	<p>1 YVETTE WANG 2 A I don't know about that. 3 Q If there was a written demand, who 4 would have it? 5 A If there is, I don't know. Could be 6 Mr. Han, because he negotiated the loan agreement 7 with William. 8 Q Have you asked him whether there's a 9 written demand from William Je from ACA? 10 A I didn't. 11 Q Does Eastern Profit show this loan as 12 a liability on its financial statements? 13 MS. CLINE: Objection. Again 14 now we're going back into financial 15 statements and your theory about the 16 loan. The judge said you and I 17 agreed we would talk about the 18 negotiation of the loan and the terms 19 of the loan. 20 We've already done that for 21 hours, and now you're going far 22 afield of the scope. 23 Q I want to know whether Eastern Profit 24 treats this as a loan. 25 MS. CLINE: Objection to form.</p> <p style="text-align: right;">Page 133</p>

34 (Pages 130 to 133)

Atkinson-Baker, Inc.
www.depo.com

1 YVETTE WANG
2 A What's the question?
3 **Q Does Eastern Profit show this as a**
4 **loan, this million dollars as a loan on its**
5 **financial statements? I'm sorry, as a liability**
6 **on its financial statements?**
7 A I believe, yes.
8 **Q Do you believe or do you know?**
9 A What is difference between I believe
10 and I know?
11 **Q Well, you either have seen the**
12 **financial statement and know it does, or you're**
13 **guessing because you think it should?**
14 MS. CLINE: Objection to form.
15 **Q My question is: Does Eastern Profit**
16 **treat this loan as a liability on its financial**
17 **statements?**
18 A Yes.
19 **Q So when did you view the financial**
20 **statements.**
21 MS. CLINE: Objection to form.
22 A I was told by the director and the
23 representative.
24 **Q Okay. So Guo Mei and Han Chunguang**
25 **both told you that they've seen the financial**

Page 134

1 YVETTE WANG
2 **statements and that Eastern Profit treats the**
3 **million dollars as a liability?**
4 MS. CLINE: Objection to form.
5 Mischaracterizes testimony. Beyond
6 the scope of the deposition.
7 A What's your question?
8 **Q Did Guo Mei tell you that she had**
9 **seen the financial statements of Eastern Profit?**
10 MS. CLINE: Again, objection.
11 This is beyond the scope of the
12 court's order, and anything we've
13 agreed to. We're not going to have
14 her testify about the financial
15 identity or the final situation of
16 the plaintiff.
17 **Q I don't care about the financial**
18 **situation. I want to know whether this entity**
19 **recognizes this as a loan that it actually has to**
20 **repay?**
21 MS. CLINE: Asked and answered.
22 MR. GREIM: I would like to
23 know.
24 A Eastern Profit confirmed, reconfirmed
25 again, again. This is a loan Eastern Profit

Page 135

1 YVETTE WANG
2 should pay back, period.
3 **Q Confirmed with who?**
4 A They told me. That's why we're suing
5 here.
6 **Q Who told you?**
7 A Eastern Profit.
8 **Q And who from Eastern Profit told you?**
9 A Both of them. They told me.
10 **Q Guo Mei and Han Chunguang?**
11 A Correct.
12 **Q And have you already described the**
13 **conversations where this occurred? These are the**
14 **conversations that you had with them in the summer**
15 **of this year?**
16 MS. CLINE: Objection to form.
17 A You're confusing me again. What's
18 the question?
19 **Q You already told us about the**
20 **conversations where Guo Mei and Han Chunguang told**
21 **you about this.**
22 A Told who?
23 **Q You. Told you about this.**
24 A Who told me?
25 **Q Guo Mei and Han Chunguang.**

Page 136

1 YVETTE WANG
2 A Mm-hmm.
3 **Q Have you already told us about the**
4 **conversation in which Guo Mei and Han Chunguang**
5 **told you that it considers this million dollars to**
6 **be a loan from ACA.**
7 A I just told you. Yes, I did tell
8 you.
9 **Q And those were the summer of 2019**
10 **discussions?**
11 MS. CLINE: Objection to form.
12 A Wow. Many times. I don't remember
13 them.
14 **Q So are you now telling me that you've**
15 **talked to Han Chunguang many times about this**
16 **loan?**
17 MS. CLINE: Objection to form.
18 A I'm telling you they are aware of
19 this litigation and the other meet. This is a
20 loan need to be paid back. And they're asking me
21 what is the litigation going on and when we can
22 get \$1 million from the two liars back.
23 **Q Could you look at Exhibit 31?**
24 A Sure.
25 **Q This is the loan agreement. Go to**

Page 137

35 (Pages 134 to 137)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 the very back.</p> <p>3 A Which page?</p> <p>4 Q Page 3. Was Chu -- do you see</p> <p>5 Chunguang Han's signature? Do you see it?</p> <p>6 A I see a signature behind Chunguang</p> <p>7 Han's name.</p> <p>8 Q Is that his signature?</p> <p>9 MS. CLINE: Objection.</p> <p>10 Foundation.</p> <p>11 A This is a accurate, as you said, true</p> <p>12 loan agreement. Of course this is his signature.</p> <p>13 What do you mean, like someone made up? I don't</p> <p>14 understand your question.</p> <p>15 Q I'm asking Eastern Profit if this is</p> <p>16 really its director's signature.</p> <p>17 A I'm telling you this is a true loan</p> <p>18 agreement. So the signature on this loan</p> <p>19 agreement, they are accurate and true.</p> <p>20 Q And how do you know that this is a</p> <p>21 true loan agreement; did someone tell you this?</p> <p>22 MS. CLINE: Objection. Asked</p> <p>23 and answered. You're badgering the</p> <p>24 witness. You asked her about the</p> <p>25 signature. She answered the</p> <p style="text-align: right;">Page 138</p>	<p>1 YVETTE WANG</p> <p>2 Q Whose name is it?</p> <p>3 A It's a signature.</p> <p>4 Q Of who?</p> <p>5 A It could be a (inaudible) or any</p> <p>6 symbolic.</p> <p>7 Q Let's go ahead and get it out. We</p> <p>8 have it.</p> <p>9 A Let's get it.</p> <p>10 (Wang Exhibit 2, Research</p> <p>11 Agreement dated December 29, 2017</p> <p>12 Bates stamped Eastern-000005 to</p> <p>13 Eastern 000009 previously marked for</p> <p>14 Identification as of this date.)</p> <p>15 Q I'm going to show you what we marked</p> <p>16 in your first deposition as Wong 2.</p> <p>17 Do you recognize this document? The</p> <p>18 question pending is whether you recognize the</p> <p>19 document.</p> <p>20 A I'm preparing to answer your</p> <p>21 question.</p> <p>22 Q Just making sure.</p> <p>23 A Yes.</p> <p>24 Q What is it?</p> <p>25 A It's called a Research Agreement.</p> <p style="text-align: right;">Page 140</p>
<p>1 YVETTE WANG</p> <p>2 question.</p> <p>3 Q Other than Mr. Grendi, has anyone</p> <p>4 else told you this is Mr. Chunguang Han's</p> <p>5 signature?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Mischaracterizes testimony.</p> <p>8 Q Did you sign Chunguang Han's</p> <p>9 signature on the research agreement in this case?</p> <p>10 A Pardon?</p> <p>11 Q Did you sign Chunguang Han's</p> <p>12 signature on the research agreement at issue in</p> <p>13 this case?</p> <p>14 A How I can sign his signature?</p> <p>15 Q Do you sign his name to the research</p> <p>16 agreement in this case?</p> <p>17 A You're confusing me. Which</p> <p>18 agreement?</p> <p>19 Q The research agreement at issue in</p> <p>20 this case.</p> <p>21 A That is a signature I was authorized</p> <p>22 to sign.</p> <p>23 Q So you were authorized to write his</p> <p>24 name on that document?</p> <p>25 A I don't believe that's his name.</p> <p style="text-align: right;">Page 139</p>	<p>1 YVETTE WANG</p> <p>2 Q It's an agreement that you signed in</p> <p>3 French Wallop's presence; isn't it?</p> <p>4 A Yes.</p> <p>5 Q And whose name did you sign?</p> <p>6 A I didn't. I did not mean to sign</p> <p>7 anyone's name here.</p> <p>8 Q Did you sign any name?</p> <p>9 A Are you Chinese Mandarin,</p> <p>10 linguistics? Do you read Mandarin?</p> <p>11 Q Answer the question. Whose name did</p> <p>12 you sign?</p> <p>13 A I didn't sign anyone's name. This is</p> <p>14 a signature.</p> <p>15 Q What does it read?</p> <p>16 A It's simple.</p> <p>17 Q So this is not a name? I'm</p> <p>18 indicating the Chinese handwriting on page 3.</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A It could be a name.</p> <p>21 Q What is it? Whose name is this?</p> <p>22 A I am authorized to sign this contract</p> <p>23 on behalf of Eastern Profit Limited. I sign here.</p> <p>24 This is my signature on behalf of Eastern Profit</p> <p>25 Limited.</p> <p style="text-align: right;">Page 141</p>

36 (Pages 138 to 141)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q Fair enough.</p> <p>3 A I can say this is my name. I can say</p> <p>4 this is in my English name or Chinese name, and</p> <p>5 this is my authorized signature here.</p> <p>6 (Indicating)</p> <p>7 Q My question is whose name is it?</p> <p>8 A Nobody's name.</p> <p>9 Q So a Mandarin speaker would look at</p> <p>10 this and say this is just squiggly lines, it's no</p> <p>11 one's name. Does it make out a name?</p> <p>12 A I don't know think any Mandarin say</p> <p>13 this name.</p> <p>14 Q This is Han Chunguang's name; isn't</p> <p>15 it?</p> <p>16 A I didn't say that.</p> <p>17 Q I'm asking you. Is this Han</p> <p>18 Chunguang's name?</p> <p>19 A I didn't say that. I don't think it</p> <p>20 is.</p> <p>21 Q Okay. So your testimony under oath</p> <p>22 is that you did not sign Han Chunguang's name?</p> <p>23 A Correct.</p> <p>24 Q You signed -- did you sign any name?</p> <p>25 MS. CLINE: Objection. Asked</p> <p style="text-align: right;">Page 142</p>	<p>1 YVETTE WANG</p> <p>2 Q What date was that signed?</p> <p>3 A You mean as Power of Attorney?</p> <p>4 Q Yes.</p> <p>5 MS. CLINE: Just to be clear, is</p> <p>6 your line of inquiry -- this is the</p> <p>7 Eastern Profit 30(b)(6). Your line</p> <p>8 of inquiry, am I correct, relates to</p> <p>9 your authority on behalf of Eastern</p> <p>10 Profit.</p> <p>11 MR. GREIM: Correct.</p> <p>12 A What's your question?</p> <p>13 Q When was the limited Power of</p> <p>14 Attorney signed?</p> <p>15 A You went me to read this; right?</p> <p>16 Q Just answer the question.</p> <p>17 A I need to know the question. What</p> <p>18 was the question?</p> <p>19 Q The question is: When was the</p> <p>20 limited Power of Attorney signed? When was it</p> <p>21 signed?</p> <p>22 A August 30, 2018.</p> <p>23 Q Right. So my question is how did you</p> <p>24 get your authority; was it orally, or was it in</p> <p>25 writing, on or before January 6, 2018 to affix</p> <p style="text-align: right;">Page 144</p>
<p>1 YVETTE WANG</p> <p>2 and answered.</p> <p>3 A I repeat again. I didn't mean to be</p> <p>4 anyone's name. I was authorized to sign on</p> <p>5 Eastern Profits, and I just sign that.</p> <p>6 Q Who authorized you to sign this</p> <p>7 agreement on behalf of Eastern Profit?</p> <p>8 A Eastern Profit.</p> <p>9 Q Who?</p> <p>10 A Is both May, M-E-I, and Mr. Han.</p> <p>11 Q So Guo Mei and Mr. Han authorized you</p> <p>12 sometime before January 6th or on January 6th to</p> <p>13 sign something on this line?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A They authorized me to handle this</p> <p>16 research project with everything this project</p> <p>17 needs Eastern to do.</p> <p>18 Q How did they authorize you to handle</p> <p>19 this project on or before January 6th?</p> <p>20 MS. CLINE: Objection. Asked</p> <p>21 and answered.</p> <p>22 A How?</p> <p>23 Q By what method did they give this</p> <p>24 authorization to you?</p> <p>25 A You have a limited Power of Attorney.</p> <p style="text-align: right;">Page 143</p>	<p>1 YVETTE WANG</p> <p>2 something to exhibit number 2, the research</p> <p>3 screen?</p> <p>4 A You should ask me these questions</p> <p>5 from the very beginning. I will give you what you</p> <p>6 need to know and what you want to know.</p> <p>7 Q Great. I can't wait to hear it.</p> <p>8 MS. CLINE: I object. Please</p> <p>9 don't stare her down. You can ask a</p> <p>10 question, and she can answer it. The</p> <p>11 stipulation is the stares we can do</p> <p>12 without.</p> <p>13 MR. GREIM: Okay. But she's</p> <p>14 making a funny face at me. That's</p> <p>15 okay.</p> <p>16 Q I would just like to know the answer</p> <p>17 to the question.</p> <p>18 How did you get the authority to sign</p> <p>19 Exhibit 2?</p> <p>20 MS. CLINE: When you say</p> <p>21 Exhibit 2, you mean --</p> <p>22 MR. GREIM: The research</p> <p>23 agreement.</p> <p>24 MS. CLINE: -- Wang Exhibit 2.</p> <p>25 You have two exhibits with the</p> <p style="text-align: right;">Page 145</p>

37 (Pages 142 to 145)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG 2 number 2 on them. 3 THE WITNESS: Can I answer? 4 MS. CLINE: Yes. 5 A I was authorized both by orally and 6 Power of Attorney. 7 Q What was the first word? 8 A Orally. O-R-A-L-L-Y. 9 Q So is there another Power of Attorney 10 that predates Guo Exhibit 2? 11 MS. CLINE: Again, the questions 12 that have to do with Golden Spring 13 and Golden Spring's authority are for 14 a separate deposition. 15 MR. GREIM: I agree. 16 MS. CLINE: Right now we're 17 talking about Eastern Profit. 18 MR. GREIM: Yup. That's exactly 19 right. 20 Q So the question is -- first of all, 21 Exhibit 2, Wang Exhibit 2, the Research Agreement 22 was signed by Eastern Profit; right? 23 A Correct. 24 Q So you've just testified that you 25 received the authority to sign by Eastern Profit</p> <p style="text-align: right;">Page 146</p>	<p>1 YVETTE WANG 2 MS. CLINE: Objection to form. 3 Mischaracterizes the document. 4 THE WITNESS: Should I answer? 5 MS. CLINE: You can answer. 6 A I don't remember the dates. 80 7 percent. Again, she doesn't want me to guess. 8 I sign this research agreement based 9 on a firm, confirmative, very firm, F-I-R-M, oral 10 authorization. 11 Q From who? 12 A From Mr. Han. 13 Q When did he give you the oral 14 authorization to sign the research agreement? 15 A December, 2017. 16 Q Okay. When in December of 2017? A 17 lot of negotiations in that month. 18 When in December of 2017 did Mr. Han 19 give you this authority? 20 A I don't remember the dates, but it 21 was before we entered into this research 22 agreement. 23 Q So did you discuss with Mr. Han the 24 terms of the research agreement? 25 A Nope.</p> <p style="text-align: right;">Page 148</p>
<p>1 YVETTE WANG 2 from two different sources, orally and by limited 3 Power of Attorney. 4 So my first question is what is the 5 limited Power of Attorney that authorized you to 6 sign the research agreement for Eastern Profit? 7 MS. CLINE: Objection to form. 8 A I have to correct my linguistic or 9 your understanding. I told you orally or Power of 10 Attorney. 11 Q Okay. So is it your testimony that 12 there is a Power of Attorney that granted you the 13 authority to sign Wang Exhibit 2, or are you 14 saying there is no limited Power of Attorney? 15 Which one is it? 16 A I repeat again. I was authorized by 17 eastern both orally and Power of Attorney. 18 Q I see. And so we just looked at one 19 Power of Attorney, but it mentions Golden Spring, 20 and it's from later in the year. 21 MS. CLINE: Objection to form. 22 Q So my question is is there some other 23 Power of Attorney that I haven't seen yet that 24 gave you the authority to sign the research 25 agreement on behalf of Eastern Property?</p> <p style="text-align: right;">Page 147</p>	<p>1 YVETTE WANG 2 Q Did you translate it for him? 3 A He didn't ask. I don't remember I 4 offered. 5 Q Did you talk to Mr. Chunguang about 6 the deal with Strategic Vision? 7 A Yes, I did. 8 Q Did he give you approval that he 9 agreed with the deal? 10 A He authorized me to deal with this 11 deal. But he is aware we're trying to disclosure 12 the Chinese corrupted official by investigation. 13 And he is on same page with us, which means he 14 agree with what we are doing. 15 Q So how did you know that that was the 16 purpose of the research agreement? 17 MS. CLINE: I'm sorry. I was 18 coughing. Can I hear that back. 19 (The requested portion of the 20 record was read back by the 21 reporter.) 22 MS. CLINE: Objection to form. 23 A How did I know? I don't remember 24 that clearly, but I heard -- this is about Chinese 25 corrupted official. They're illegal like</p> <p style="text-align: right;">Page 149</p>

38 (Pages 146 to 149)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 investigation from Miles and from Wallop, Waller.</p> <p>3 Both.</p> <p>4 I don't remember like which dates,</p> <p>5 the precise language, but Miles is looking for</p> <p>6 some professional company, and Waller, Wallop</p> <p>7 represented themselves, the best research company,</p> <p>8 professional qualified who can help our research.</p> <p>9 So I got to know about this research from there.</p> <p>10 Q Why did you -- what made you</p> <p>11 understand that Mr. Han was the person to go to</p> <p>12 for authority to sign the research agreement?</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 A What's the question?</p> <p>15 Q How did you come to understand that</p> <p>16 Mr. Han was the person for you to go to to seek</p> <p>17 authority to sign the research agreement?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A Because Waller and Wallop, obviously</p> <p>20 they did not want Mile's name on any of the</p> <p>21 contracts.</p> <p>22 Q I'm sorry?</p> <p>23 A I didn't finish.</p> <p>24 Q Okay. Go ahead.</p> <p>25 A And Miles, he expressed okay. Let's</p> <p style="text-align: right;">Page 150</p>	<p>1 YVETTE WANG</p> <p>2 How did you know Mr. Han was the person to go to</p> <p>3 to get authority from Eastern Profit?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A I started to ask and look for someone</p> <p>6 as I just said. It was Mr. Han. He mentioned to</p> <p>7 me Eastern Profit could be on the contract.</p> <p>8 Q This is Chunguang Han?</p> <p>9 A Mr. Han.</p> <p>10 Q Han Chunguang; right?</p> <p>11 A Correct. He gave me Eastern Profit's</p> <p>12 name.</p> <p>13 Q So the person who suggested Eastern</p> <p>14 Profit to take Mr. Guo's place was Han Chunguang?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A What do you mean take Mr. Guo's</p> <p>17 place?</p> <p>18 Q Who was the first person who</p> <p>19 mentioned Eastern Profit to you?</p> <p>20 A I don't remember clearly. It could</p> <p>21 be either Mr. Han or Mr. Guo, but I don't remember</p> <p>22 that clearly.</p> <p>23 Q You remember testifying at your first</p> <p>24 deposition it was Mr. Guo?</p> <p>25 A You want me to read the page? Which</p> <p style="text-align: right;">Page 152</p>
<p>1 YVETTE WANG</p> <p>2 look for someone who can be on this contract</p> <p>3 pursuing the same goal with us. I didn't finish.</p> <p>4 Q Okay. Keep going.</p> <p>5 A So I start to look for, and I asked</p> <p>6 Mr. Han. He was onboard. That's it.</p> <p>7 Q Okay. But my question unfortunately</p> <p>8 was: How did you know that Mr. Han was the right</p> <p>9 person to speak with to obtain Eastern Profit's</p> <p>10 authority?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 A Okay. I'm still confused by you.</p> <p>13 Q We know that at some point you</p> <p>14 identified Eastern Profit. We know that.</p> <p>15 A Mm-hmm.</p> <p>16 Q You had to go to a real person though</p> <p>17 to speak on behalf of Eastern Profit to give you</p> <p>18 authority; right?</p> <p>19 MS. CLINE: Objection to the</p> <p>20 form.</p> <p>21 A Continue.</p> <p>22 Q You agree with me so far; right?</p> <p>23 A I heard you so far.</p> <p>24 Q Okay. Fine. My question is why did</p> <p>25 you go to Mr. Han? Why not some other person?</p> <p style="text-align: right;">Page 151</p>	<p>1 YVETTE WANG</p> <p>2 page?</p> <p>3 Q Before we go back and do this, why</p> <p>4 don't we do it the right way. I'm just going to</p> <p>5 ask you. You remember testifying before that you</p> <p>6 first heard the words Eastern Profit from Mr. Guo?</p> <p>7 A You're asking me is that my testimony</p> <p>8 in my first deposition?</p> <p>9 Q Yes. Yes.</p> <p>10 MS. CLINE: He's asking whether</p> <p>11 you remember.</p> <p>12 A I don't remember that.</p> <p>13 Q All right. Look at page 12, please,</p> <p>14 of your transcript.</p> <p>15 A 12, right.</p> <p>16 Q Yes. Let's look at page 10. Even</p> <p>17 better, it's all over these pages.</p> <p>18 Let's start on 10. Why don't you</p> <p>19 just take a look at pages 10 through 13. Just</p> <p>20 take a second to read through.</p> <p>21 A From page 10 to 13?</p> <p>22 Q Yes, to the correct answer at the</p> <p>23 bottom of 13. You can go to the bottom of 13.</p> <p>24 Are you finished?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 153</p>

39 (Pages 150 to 153)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q Okay. Now do you recall now that you</p> <p>3 testified that Mr. Guo introduced you to Eastern</p> <p>4 Profit?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A Now I do.</p> <p>7 Q All right. I don't want to get you</p> <p>8 too far down the road with Han Chunguang, because</p> <p>9 I remember his testimony.</p> <p>10 So how is it then that you learned</p> <p>11 that Han Chunguang had anything to do with Eastern</p> <p>12 Profit?</p> <p>13 A What's the question?</p> <p>14 Q How did you learn that Han Chunguang</p> <p>15 had anything to do with Eastern Profit?</p> <p>16 A How did I learn?</p> <p>17 Q Mm-hmm.</p> <p>18 A That was I asked him there's a</p> <p>19 project in here, kind of like are you interested.</p> <p>20 And then he told me Eastern Profit probably could</p> <p>21 join this project.</p> <p>22 Q Han Chunguang said this to you?</p> <p>23 A I don't remember the precise words</p> <p>24 quote, okay. That is my impression. I was asking</p> <p>25 him, and then he agree with our big goal, to take</p> <p style="text-align: right;">Page 154</p>	<p>1 YVETTE WANG</p> <p>2 A Should I continue?</p> <p>3 Q Go ahead. I'm sorry. I thought you</p> <p>4 were done.</p> <p>5 A He told me Eastern Profit could be</p> <p>6 onboard. I can go ahead to sign a contract.</p> <p>7 Q Did he explain to you what his</p> <p>8 relationship with Eastern Profit was?</p> <p>9 A I forgot the precise words he told</p> <p>10 me, but he expressed he was or he is running</p> <p>11 Eastern Profits, and he told me Eastern Profits</p> <p>12 will be on the same side with our big anti-CCP,</p> <p>13 Chinese Communist Party.</p> <p>14 Q Did Mr. Han tell you what his duties</p> <p>15 and responsibilities were?</p> <p>16 A He was running. My impression is he</p> <p>17 was running.</p> <p>18 Q Who told you he was the, quote,</p> <p>19 principal of Eastern?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A Called principal.</p> <p>22 Q Who told you that he was the</p> <p>23 principal of Eastern?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A That is my understanding, he's the</p> <p style="text-align: right;">Page 156</p>
<p>1 YVETTE WANG</p> <p>2 down CCB. And he said kind of like it's a great</p> <p>3 job. Let's do it.</p> <p>4 Q Who told you that Han Chunguang had</p> <p>5 any authority to act on behalf of Eastern Profit?</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 A You mean when?</p> <p>8 Q No. Who. Who told you that Han</p> <p>9 Chunguang had any authority to act on behalf of</p> <p>10 Eastern Profit?</p> <p>11 A Mei told me.</p> <p>12 Q When did she tell you that?</p> <p>13 A I forgot the precise time. It should</p> <p>14 be sometime in 2018.</p> <p>15 Q Okay. But back in December of 2017,</p> <p>16 all right --</p> <p>17 A Yes.</p> <p>18 Q -- when you testified that Han</p> <p>19 Chunguang gave you authority to sign the research</p> <p>20 agreement on behalf of Eastern Profit, who told</p> <p>21 you that Han Chunguang had any authority to speak</p> <p>22 on behalf of Eastern Profit?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A He told me.</p> <p>25 Q He told you?</p> <p style="text-align: right;">Page 155</p>	<p>1 YVETTE WANG</p> <p>2 principal.</p> <p>3 Q And who told you that?</p> <p>4 A Mr. Han expressed Eastern could be</p> <p>5 onboard and he runs eastern. So I recognize him.</p> <p>6 He is a principal.</p> <p>7 And later on Mei confirmed her</p> <p>8 authorization to Mr. Han also which double confirm</p> <p>9 my recognition to Mr. Han as the principal of</p> <p>10 Eastern Profit.</p> <p>11 Q Do you remember testifying at your</p> <p>12 deposition in January that you didn't know what</p> <p>13 Mr. Han's duties and responsibilities were, and it</p> <p>14 was Mr. Guo who told you he was the principal of</p> <p>15 Eastern?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Which page?</p> <p>18 Q Page 97. You can start up on 96 if</p> <p>19 you want to. The person starts asking about</p> <p>20 Chunguang Han at line 13.</p> <p>21 All right Miss Wang, do you see that</p> <p>22 the questioner asked you at the bottom of 96, he</p> <p>23 says, line 18: What is his exact position</p> <p>24 Eastern?</p> <p>25 You answer: He is the President of</p> <p style="text-align: right;">Page 157</p>

40 (Pages 154 to 157)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Eastern. It should be on the paper here.</p> <p>3 Question: It just says he's a</p> <p>4 principal. Answer: Okay. Okay, the principal of</p> <p>5 Eastern.</p> <p>6 Question: What does that mean?</p> <p>7 Answer: You mean my understanding?</p> <p>8 Now onto 97.</p> <p>9 Question: Yes.</p> <p>10 Answer: Boss, I don't know. I don't</p> <p>11 know his official title question.</p> <p>12 Question: Is he an officer,</p> <p>13 director?</p> <p>14 Answer: I don't know.</p> <p>15 Question: Do you know what his</p> <p>16 duties and responsibilities are.</p> <p>17 Answer: I don't know.</p> <p>18 Question: How did you know he was a</p> <p>19 principal?</p> <p>20 Answer: Mr. Guo told me.</p> <p>21 Did I read that correctly?</p> <p>22 A You did that great.</p> <p>23 Q Okay. That was your testimony in</p> <p>24 January; correct?</p> <p>25 A Correct.</p> <p style="text-align: right;">Page 158</p>	<p>1 YVETTE WANG</p> <p>2 A What's your question?</p> <p>3 Q Are you saying that you did not know</p> <p>4 about your own conversation with Guo Mei or Han</p> <p>5 Chunguang when you first testified in January of</p> <p>6 2019?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 Q Did you learn something new about</p> <p>9 those discussions since January?</p> <p>10 A What is your precise question?</p> <p>11 Q In January when you first testified,</p> <p>12 you were only about what, a year removed from</p> <p>13 these events; right?</p> <p>14 A January, my first deposition, until</p> <p>15 now is about 10 month.</p> <p>16 Q So that these 10 months, did you find</p> <p>17 additional communication between yourself and</p> <p>18 Mr. Chunguang or Guo Mei to remind you that, in</p> <p>19 fact, they're the ones who told you what Han</p> <p>20 Chunguang's role was?</p> <p>21 A As I just testified, I did talk with</p> <p>22 Mei and Mr. Han in the summer, and later summer,</p> <p>23 which is between my first deposition and now.</p> <p>24 Q Okay.</p> <p>25 A I understand. I start to recognize</p> <p style="text-align: right;">Page 160</p>
<p>1 YVETTE WANG</p> <p>2 Q So now you're telling us that in fact</p> <p>3 Guo Mei and Han Chunguang himself told you these</p> <p>4 things?</p> <p>5 A First --</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 Go ahead.</p> <p>8 A I don't know what paper here mean.</p> <p>9 Okay? I have no memory about here. Paper here.</p> <p>10 What's the paper here first. Second, why I am</p> <p>11 here today for you Eddie, because the judge</p> <p>12 ordered clearly in October 28th order for this</p> <p>13 deposition saying Wang, Yvette Wang, me. I was</p> <p>14 not prepared enough for my first deposition which</p> <p>15 means from my first deposition until now, 10</p> <p>16 months, I learned more knowledge and information</p> <p>17 than 10 month ago.</p> <p>18 Q But this is about your own</p> <p>19 interaction with Mr. Guo. This is not about</p> <p>20 information that somebody else told you. You're</p> <p>21 testifying about your own interactions; aren't</p> <p>22 you?</p> <p>23 MS. CLINE: Objection.</p> <p>24 Argumentative. Asked and answered.</p> <p>25 Calm down.</p> <p style="text-align: right;">Page 159</p>	<p>1 YVETTE WANG</p> <p>2 as a 31B witness. I need to find out information,</p> <p>3 which means as judge directed on October 28th, I'm</p> <p>4 allowed to prepare for my today deposition.</p> <p>5 Q We want you to do so. However, are</p> <p>6 you telling me that -- maybe we misunderstood your</p> <p>7 testimony here.</p> <p>8 My question to you was before you</p> <p>9 signed the research agreement back on January 6,</p> <p>10 2018, did Guo Mei or any other person -- did any</p> <p>11 person other than Guo Wengui tell you that Han</p> <p>12 Chunguang had authority to act on behalf of</p> <p>13 Eastern Profit?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A Before the contract signed?</p> <p>16 Q Right.</p> <p>17 A I don't remember that clearly. But</p> <p>18 based on my memory, which I worked after my first</p> <p>19 deposition, I was looking for someone who can join</p> <p>20 this project. Then Mr. Guo looking for also, I</p> <p>21 guess. I cannot represent him.</p> <p>22 His agent on behalf of Eastern with</p> <p>23 strategic equation, which means possibly when I</p> <p>24 was talking with Mr. Han, and Mr. Guo talked with</p> <p>25 him also, which I don't know. So it's right</p> <p style="text-align: right;">Page 161</p>

41 (Pages 158 to 161)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 before and after those couple of days. I don't</p> <p>3 have the precise dates.</p> <p>4 Q You first learned of Eastern Profit's</p> <p>5 existence just before going down to Virginia to</p> <p>6 sign the contract with Miss Wallop; isn't that</p> <p>7 right?</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A That's correct.</p> <p>10 (Wang Exhibit 4, a document</p> <p>11 titled Research Agreement dated</p> <p>12 January 1, 2018 and Bates stamped</p> <p>13 Eastern-000001 to Eastern-000004</p> <p>14 previously marked for Identification</p> <p>15 as of this date.)</p> <p>16 Q I'm going to hand you what we marked</p> <p>17 in the original deposition as Exhibit 4. I'm</p> <p>18 giving you another copy for your attorney.</p> <p>19 This is Wong Exhibit 4, Eastern Bates</p> <p>20 numbers 1 through 4. This is a document that you,</p> <p>21 or that Eastern produced to us in this case. And</p> <p>22 if you want, you can compare it. Maybe it will be</p> <p>23 helpful to compare it to the actual research</p> <p>24 agreement which is Exhibit -- Wang Exhibit 2.</p> <p>25 You'll see they're not the same</p> <p style="text-align: right;">Page 162</p>	<p>1 YVETTE WANG</p> <p>2 Q Do you recall this being -- first of</p> <p>3 all, the agreement wasn't signed on January 1; was</p> <p>4 it?</p> <p>5 A You're right.</p> <p>6 Q And do you recall this being a draft</p> <p>7 of the agreement, at least a draft, maybe not the</p> <p>8 only draft, as of January 1, 2018?</p> <p>9 MS. CLINE: Exhibit 41.</p> <p>10 MR. GREIM: Yes, Exhibit 4.</p> <p>11 A It has been almost 20 months. I</p> <p>12 don't remember clearly what was the negotiation,</p> <p>13 but since this is Eastern, we produce this. I</p> <p>14 have to say yes.</p> <p>15 Q And do you recall that at this time I</p> <p>16 won't -- I don't want to characterize this the</p> <p>17 wrong way, but do you agree that at this time</p> <p>18 Eastern Profit had not been identified yet as the</p> <p>19 entity that would be entering the contract?</p> <p>20 MS. CLINE: At which time?</p> <p>21 MR. GREIM: As of January 1,</p> <p>22 2018.</p> <p>23 A You are asking me by January 1, 2018,</p> <p>24 Eastern Profit was not recognized?</p> <p>25 Q Right.</p> <p style="text-align: right;">Page 164</p>
<p>1 YVETTE WANG</p> <p>2 document; are they?</p> <p>3 A You're right.</p> <p>4 Q Wang Exhibit 4 doesn't have</p> <p>5 signatures on it; right?</p> <p>6 A Correct.</p> <p>7 Q It doesn't have the same payment</p> <p>8 terms. The amount is only \$250,000. If you look</p> <p>9 on page 4 of Wang Exhibit 4, do you see that?</p> <p>10 A I'm reading this. You want me just</p> <p>11 to read this paragraph; right?</p> <p>12 Q Yeah. My only question is I just</p> <p>13 wanted you to look at the payment terms paragraph.</p> <p>14 And I'm just asking you to see that this is only</p> <p>15 \$250,000 a month in this draft; is that right?</p> <p>16 A Correct.</p> <p>17 Q And strategic was demanding a much</p> <p>18 higher amount, which it ultimately got, \$750,000 a</p> <p>19 month; isn't that right?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A Correct.</p> <p>22 Q If you go to the front of Wong</p> <p>23 Exhibit 4, you see the date typed up in the top is</p> <p>24 January 1, 2018?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 163</p>	<p>1 YVETTE WANG</p> <p>2 A No. I don't agree with you.</p> <p>3 Q Okay. Okay.</p> <p>4 So when was Eastern Profit first</p> <p>5 identified as the contracting party for we'll call</p> <p>6 it your side of the contract?</p> <p>7 A Was identified? You mean confirmed</p> <p>8 or found; right?</p> <p>9 Q Sure.</p> <p>10 A I don't remember that clearly, but I</p> <p>11 started to talk to Hank kind of like November</p> <p>12 earliest, November, December of 2017.</p> <p>13 Q But you testified that you didn't</p> <p>14 learn the name of Eastern Profit until just before</p> <p>15 going down to Virginia to negotiate with French</p> <p>16 Wallop. So how could Eastern Profit have been</p> <p>17 identified back in November of 2017?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 Mischaracterizes testimony.</p> <p>20 A Why before? Like two hours right</p> <p>21 before I came down to Virginia? I'm talking about</p> <p>22 like a month or two month. Less than two month.</p> <p>23 I don't think that is a long time. I can still</p> <p>24 quote that as right before.</p> <p>25 Q Is it your testimony that you first</p> <p style="text-align: right;">Page 165</p>

42 (Pages 162 to 165)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 learned that Eastern Profit would be the</p> <p>3 contracting party in November of 2017?</p> <p>4 A I don't remember that clearly, but</p> <p>5 it's for sure the latest is November -- no,</p> <p>6 December or even November, late November of 2017.</p> <p>7 Q Mr. Chunguang Han is not a director</p> <p>8 of Eastern Profit, is he?</p> <p>9 A You're asking about now?</p> <p>10 Q Right.</p> <p>11 A He is not.</p> <p>12 Q Between September, 2017 and March,</p> <p>13 2018 he was not a director of Eastern Profit, was</p> <p>14 he?</p> <p>15 A Between September of 2017 until when?</p> <p>16 Q March, 2018 he was not a director,</p> <p>17 was he?</p> <p>18 A He was not.</p> <p>19 Q Is there any document appointing</p> <p>20 Mr. Han as any sort of an officer or</p> <p>21 representative of Eastern Profit for the period</p> <p>22 September, 2017 to March, 2018?</p> <p>23 A He is authorized.</p> <p>24 Q My question is is there a document</p> <p>25 giving him that authority?</p> <p style="text-align: right;">Page 166</p>	<p>1 YVETTE WANG</p> <p>2 me also, but I don't remember that clearly.</p> <p>3 Q Okay. So other than a recollection</p> <p>4 that at some point Mr. Han and Miss Mei told you</p> <p>5 that he had authority to act for Eastern Profit</p> <p>6 between September, 2017 and March, 2018, can</p> <p>7 Eastern Profit point to any other documents</p> <p>8 reflecting that he had that role?</p> <p>9 A I didn't ask.</p> <p>10 Q Do they exist? Do the documents</p> <p>11 exist?</p> <p>12 A I did not ask.</p> <p>13 MR. GREIM: Why don't we take a</p> <p>14 short break. Let's take a</p> <p>15 five-minute break.</p> <p>16 THE VIDEOGRAPHER: The time is</p> <p>17 3:25 p.m., Wednesday, October 30,</p> <p>18 2019.</p> <p>19 This is the end of media number</p> <p>20 3 of the videotaped deposition of</p> <p>21 Yvette Wang.</p> <p>22 We're off the record.</p> <p>23 (At this time, a brief recess</p> <p>24 was taken.)</p> <p>25 THE VIDEOGRAPHER: The time is</p> <p style="text-align: right;">Page 168</p>
<p>1 YVETTE WANG</p> <p>2 A I didn't remember I saw that document</p> <p>3 paper, no.</p> <p>4 Q Why do you believe he is authorized?</p> <p>5 Let's stick to the period of September of 2017 to</p> <p>6 March, 2018.</p> <p>7 Why does Eastern Profit say he's</p> <p>8 authorized to act during that period?</p> <p>9 A September, 2017 until March, 2018;</p> <p>10 right?</p> <p>11 I don't remember the precise words.</p> <p>12 My impression is I was told he was the director.</p> <p>13 He is still running the company authorized by the</p> <p>14 director.</p> <p>15 And then later on Mei confirmed</p> <p>16 Mr. Han made the correct representation about</p> <p>17 himself and his wife.</p> <p>18 Q Okay. So who is the person that told</p> <p>19 you that he had been given authority to act on</p> <p>20 behalf of Eastern Profit between September, 2017</p> <p>21 and March, 2018?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 Asked and answered.</p> <p>24 A Mr. Han, he expressed it to me. I</p> <p>25 don't remember clearly. Miss Mei mentioned it to</p> <p style="text-align: right;">Page 167</p>	<p>1 YVETTE WANG</p> <p>2 3:39 p.m., Wednesday, October 30,</p> <p>3 2019. This is media number 4 of the</p> <p>4 videotaped deposition of Miss Yvette</p> <p>5 Wang. We're back on the record.</p> <p>6 CONTINUED EXAMINATION</p> <p>7 BY MR. GREIM:</p> <p>8 Q All right, Miss Wang. Welcome back.</p> <p>9 Based on your most recent testimony,</p> <p>10 it sounds like there are two individuals who we</p> <p>11 can say had knowledge of the negotiation of the</p> <p>12 contract between Eastern Profit and Strategic</p> <p>13 Division, Guo Mei and Han Chunguang. Is that</p> <p>14 correct?</p> <p>15 MS. CLINE: Objection.</p> <p>16 Q Let me strike that.</p> <p>17 A Too long a question. I going to</p> <p>18 forget.</p> <p>19 Q Is it fair to say that Han Chunguang</p> <p>20 and Guo Mei had knowledge of Eastern Profit's</p> <p>21 negotiation of the contract with Eastern -- with</p> <p>22 Strategic Vision?</p> <p>23 A You're talking about this research</p> <p>24 agreement; right?</p> <p>25 Q I am.</p> <p style="text-align: right;">Page 169</p>

43 (Pages 166 to 169)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A They don't have the details like in</p> <p>3 terms of this contract. But they know or they</p> <p>4 knew we hired a so-called professional</p> <p>5 investigation company which really Shell Company</p> <p>6 and liars.</p> <p>7 Q But if I understand you correctly,</p> <p>8 you have now testified that Han Chunguang knew of</p> <p>9 the agreement before it was signed, approved of</p> <p>10 its purpose, and authorized you to sign it?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 Q Is that correct?</p> <p>13 A Mr. Han did not get that deeply</p> <p>14 involved.</p> <p>15 Q However, it is true, isn't it, that</p> <p>16 you told Han Chunguang about the contract, you</p> <p>17 told him about the goals of the contract, and you</p> <p>18 asked for his authority to sign it.</p> <p>19 That is your testimony today; isn't</p> <p>20 it?</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 A I told him we found a research</p> <p>23 company. Miles was meeting with their</p> <p>24 representatives. They seem like qualified and</p> <p>25 professional by them. Most likely we can contract</p> <p style="text-align: right;">Page 170</p>	<p>1 YVETTE WANG</p> <p>2 Q Very good. Please take a look at</p> <p>3 what we marked in your other deposition as Wang</p> <p>4 Exhibit 3.</p> <p>5 (Wang Exhibit 3, a document</p> <p>6 titled Plaintiff Eastern Profit</p> <p>7 Corporation Limited's Responses and</p> <p>8 Objections to Defendant Strategic</p> <p>9 Vision US, LLC's First Set of</p> <p>10 Interrogatories previously marked for</p> <p>11 Identification as of this date.)</p> <p>12 Q Do you recognize these as Eastern</p> <p>13 Profit Limited's responses and objections to</p> <p>14 Strategic Vision's first set of interrogatories?</p> <p>15 You'll see that the second to last</p> <p>16 page you have signed it, and Karen Maistrello</p> <p>17 notarized your signature on December 20, 2018.</p> <p>18 A You want me to read through all the</p> <p>19 pages?</p> <p>20 Q No. I'm just asking do you remember</p> <p>21 verifying the interrogatory responses on behalf of</p> <p>22 Eastern Profit in this case. That's you, isn't</p> <p>23 it? You signed this?</p> <p>24 A Correct.</p> <p>25 Q Then if you go to page 1 -- I'm</p> <p style="text-align: right;">Page 172</p>
<p>1 YVETTE WANG</p> <p>2 them, start research.</p> <p>3 Q And before January 6, he told you</p> <p>4 that you can sign the agreement; is that right?</p> <p>5 A After I told him that, he said please</p> <p>6 go ahead. You are the miles. We believe you</p> <p>7 guys. Go ahead with this company.</p> <p>8 Q And your testimony also is that the</p> <p>9 reason you believed you had authority or -- I'm</p> <p>10 sorry. Let me strike that.</p> <p>11 The reason you believe that Han had</p> <p>12 authority to give you that approval, is that Han</p> <p>13 told you he had the authority and Guo Mei may told</p> <p>14 you he had the authority before you signed the</p> <p>15 contract; is that right?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 A Before I sign a contract I was</p> <p>18 authorized to proceed and execute with this</p> <p>19 contract. I was told I'm authorized to sign it.</p> <p>20 Q My question though is who told you</p> <p>21 that Han Chunguang could give you the authority</p> <p>22 to sign the contract? Who told you Han Chunguang</p> <p>23 had the authority on behalf of Eastern Profit?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 A Both Mr. Han and Miss Mei.</p> <p style="text-align: right;">Page 171</p>	<p>1 YVETTE WANG</p> <p>2 sorry, page 2, question 1, you see the very first</p> <p>3 thing says: Identify all persons with whom</p> <p>4 Eastern consulted when answering these</p> <p>5 interrogatories or who were otherwise involved in</p> <p>6 any way in answering these interrogatories?</p> <p>7 Do you see that question? Then in</p> <p>8 response, first Eastern objects, and then the</p> <p>9 second sentence you see where it says subject to</p> <p>10 Eastern's objection, Yvette Wong and Guo Wengui</p> <p>11 were consulted with answering these</p> <p>12 interrogatories.</p> <p>13 Did I read that right?</p> <p>14 A Yes.</p> <p>15 Q In fact you did consult with Guo</p> <p>16 Wengui when answering these interrogatories;</p> <p>17 didn't you?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 A I don't remember. This is the</p> <p>20 conversation my lawyer worked with.</p> <p>21 Q Then let's turn to -- well, let me</p> <p>22 ask you: Did you provide any input into these</p> <p>23 interrogatory responses?</p> <p>24 MS. CLINE: That's a yes or no</p> <p>25 question.</p> <p style="text-align: right;">Page 173</p>

44 (Pages 170 to 173)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A Yes.</p> <p>3 Q Now let's go to item 5. It says:</p> <p>4 Identify each person with knowledge of the</p> <p>5 agreement including the negotiation of same.</p> <p>6 Do you see that?</p> <p>7 A Yes.</p> <p>8 Q Then the response starts with an</p> <p>9 objection under Local Rule 33.3. And then it</p> <p>10 continues: Subject to Eastern's objection, French</p> <p>11 Wallop, J. Michael Waller, Yvette Wang, Lianchao</p> <p>12 Han, Guo Wengui and Gary Smith have knowledge of</p> <p>13 the agreement, including the negotiation of the</p> <p>14 same.</p> <p>15 Did I read that right?</p> <p>16 A Yes.</p> <p>17 Q You did not list Guo Mei or Han</p> <p>18 Chunguang in this answer; did you?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 Mischaracterizes the interrogatory</p> <p>21 process.</p> <p>22 A Correct.</p> <p>23 Q When was Mr. Guo designated an agent</p> <p>24 by Eastern Profit for purposes of negotiating the</p> <p>25 agreement?</p> <p style="text-align: right;">Page 174</p>	<p>1 YVETTE WANG</p> <p>2 extent it calls for a legal</p> <p>3 conclusion.</p> <p>4 A I'm still confused by your question.</p> <p>5 Q Well, Eastern Profit negotiated this</p> <p>6 agreement through somebody; right? There is an</p> <p>7 actual person doing the negotiation. Do you agree</p> <p>8 with me?</p> <p>9 A Yes.</p> <p>10 Q And Eastern Profit has admitted that</p> <p>11 Guo was its agent for purposes of the contract</p> <p>12 negotiations; right?</p> <p>13 A Yeah.</p> <p>14 Q And my question is was there a time</p> <p>15 when someone else was Eastern Profit's agent for</p> <p>16 purposes of negotiating the agreement?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Negotiation about the agreement;</p> <p>19 right?</p> <p>20 Q Correct.</p> <p>21 A Myself.</p> <p>22 Q Okay. Were you an agent negotiating</p> <p>23 on behalf of Eastern Profit for any time before</p> <p>24 Mr. Guo began negotiating on behalf of Eastern</p> <p>25 Profit?</p> <p style="text-align: right;">Page 176</p>
<p>1 YVETTE WANG</p> <p>2 A I do not know the precise date,</p> <p>3 because in the very beginning remember I was not</p> <p>4 involved here. So that was Lianchao Han involved</p> <p>5 by that part.</p> <p>6 Q Fair enough. I'm asking Eastern</p> <p>7 Profit when it designated Mr. Guo as agent for</p> <p>8 purposes of negotiations.</p> <p>9 MS. CLINE: I'm not sure that</p> <p>10 was the topic of the deposition</p> <p>11 notice.</p> <p>12 You can answer if you know. If</p> <p>13 you don't know, that's your</p> <p>14 testimony.</p> <p>15 A I will try to help you. At least in</p> <p>16 December of 2017.</p> <p>17 Q But your testimony is that Eastern</p> <p>18 Profit may have been identified as the signer of</p> <p>19 this agreement as early as November?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A What's the question?</p> <p>22 Q My question is: Was there ever a</p> <p>23 period where Eastern Profit was negotiating the</p> <p>24 agreement, and Mr. Guo was not its agent?</p> <p>25 MS. CLINE: Objection to the</p> <p style="text-align: right;">Page 175</p>	<p>1 YVETTE WANG</p> <p>2 A What's the question? I'm sorry.</p> <p>3 Q My question is was there a period</p> <p>4 before Mr. Guo began negotiating on behalf of</p> <p>5 Eastern Profit when you were negotiating on behalf</p> <p>6 of Eastern Profit?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 Again, this is not -- this is not</p> <p>9 within the scope of the designated</p> <p>10 questions, and I don't believe that</p> <p>11 this subject of authorization to sign</p> <p>12 the contract was even in dispute.</p> <p>13 A I don't remember that.</p> <p>14 Q Okay. So is it Eastern Profit's</p> <p>15 position that at all times Guo was the agent of</p> <p>16 Eastern Profit for purposes of negotiating the</p> <p>17 contract?</p> <p>18 MS. CLINE: Objection to form.</p> <p>19 Mischaracterizes testimony. Calls</p> <p>20 for a legal conclusion.</p> <p>21 The court has already made an</p> <p>22 observation about Mr. Guo's agency.</p> <p>23 With respect to agency beyond that,</p> <p>24 this witness isn't qualified to</p> <p>25 answer from a legal perspective.</p> <p style="text-align: right;">Page 177</p>

45 (Pages 174 to 177)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 MR. GREIM: I would still like</p> <p>3 the Eastern Profit's answer, and you</p> <p>4 preserve your objection?</p> <p>5 MS. WANG: Should I answer?</p> <p>6 MS. CLINE: Go for it.</p> <p>7 A I remember when I was negotiate --</p> <p>8 negotiating the terms of agreement, I did ask the</p> <p>9 advice from Mr. Guo.</p> <p>10 Q And did you ask anyone else when you</p> <p>11 were negotiating on behalf of Eastern Profit for</p> <p>12 advice?</p> <p>13 A Mr. Gare Smith.</p> <p>14 Q He's an attorney; right?</p> <p>15 A Correct.</p> <p>16 Q At the Foley Hoag Law Firm?</p> <p>17 A Yes.</p> <p>18 Q Other than Mr. Smith and Mr. Guo, did</p> <p>19 you ask anyone else for advice when you were</p> <p>20 negotiating the contract.</p> <p>21 Don't include lawyers, please.</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A Should I? I don't remember I did.</p> <p>24 Q Did you -- let me ask you this.</p> <p>25 Do you recall testifying at your</p> <p style="text-align: right;">Page 178</p>	<p>1 YVETTE WANG</p> <p>2 idea, who else came up with them?</p> <p>3 A Mr. Guo devised most of the name, not</p> <p>4 only 15. They are the name on Internet. And</p> <p>5 almost everyone knows they are corrupted Chinese</p> <p>6 communist party official.</p> <p>7 Q Who on behalf of Eastern Profit</p> <p>8 decided which 15 names would be given to Strategic</p> <p>9 Vision?</p> <p>10 A Based on the information on Internet,</p> <p>11 I put together the name list, and I took the</p> <p>12 advice from Mr. Guo.</p> <p>13 Q I'm sorry. Did you identify any</p> <p>14 names on your own?</p> <p>15 MS. CLINE: Asked and answered.</p> <p>16 A What's the question?</p> <p>17 Q Did you identify any of the 15 names</p> <p>18 on your own without the advice of Mr. Guo?</p> <p>19 A I did.</p> <p>20 Q So is it your testimony that you came</p> <p>21 up -- let me go to this.</p> <p>22 Do you recall giving a packet of 15</p> <p>23 names to French Wallop and Mike Waller for</p> <p>24 research purposes?</p> <p>25 A I gave 15 names to Wallop to</p> <p style="text-align: right;">Page 180</p>
<p>1 YVETTE WANG</p> <p>2 deposition that there were 15 names that were</p> <p>3 given to Strategic Vision to research?</p> <p>4 A You're talking about the content of</p> <p>5 my first deposition; right?</p> <p>6 Q Correct.</p> <p>7 A Can I review that?</p> <p>8 Q Let me just ask you. Let's save</p> <p>9 time.</p> <p>10 Did Eastern Profit give Strategic</p> <p>11 Vision 15 names to research?</p> <p>12 A One five, 15.</p> <p>13 Q Correct. And all 15 names came from</p> <p>14 Guo; correct?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A Not really.</p> <p>17 Q All right. Where else did they come</p> <p>18 from?</p> <p>19 A Most of the names everyone knows.</p> <p>20 Everyone can find a name from Internet.</p> <p>21 Q Who provided --</p> <p>22 MS. CLINE: Were you finished</p> <p>23 with your answer?</p> <p>24 MS. WANG: Yes. That's it.</p> <p>25 Q So if the 15 names were not Mr. Guo's</p> <p style="text-align: right;">Page 179</p>	<p>1 YVETTE WANG</p> <p>2 investigate.</p> <p>3 Q Did Mr. Guo disagree with any of the</p> <p>4 names on the 15 name list?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 A I don't remember that.</p> <p>7 Q Do you recall testifying at your</p> <p>8 first deposition that nobody other than you and</p> <p>9 Mr. Guo worked on the names and that you did not</p> <p>10 know how Eastern Profit had identified the 15</p> <p>11 individuals?</p> <p>12 A You're quoting my first deposition?</p> <p>13 Q Yes, I am.</p> <p>14 A Can I review that?</p> <p>15 Q Let's take a look.</p> <p>16 A Which page?</p> <p>17 Q Look at page 35, please.</p> <p>18 A 35, right.</p> <p>19 Q Yes. If you look at the bottom, 35,</p> <p>20 line 22. Question: Did you work with anybody</p> <p>21 else on this project other than Mr. Guo? And</p> <p>22 Mr. Grendi objected.</p> <p>23 Your answer at the top of 36, No.</p> <p>24 Question: Was anybody else from</p> <p>25 Golden Springs involved in this project?</p> <p style="text-align: right;">Page 181</p>

46 (Pages 178 to 181)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Objection.</p> <p>3 Your answer on line 7, No.</p> <p>4 8. How did Eastern Profit identify</p> <p>5 these individuals?</p> <p>6 Line 10, Answer: I don't know.</p> <p>7 You never asked? Answer: No.</p> <p>8 Question: Mr. Guo never said this is</p> <p>9 where we got this list of corrupt people?</p> <p>10 Answer: No.</p> <p>11 Did I read that correctly?</p> <p>12 A Yes.</p> <p>13 Q So today your testimony is that you</p> <p>14 do know how Eastern Profit identified the 15</p> <p>15 individuals?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 Q Your testimony is they got them off</p> <p>18 the Internet?</p> <p>19 MS. CLINE: Objection.</p> <p>20 A You've asking me one question or two</p> <p>21 questions, Eddie? What is the first question?</p> <p>22 Q Well, did you learn something knew</p> <p>23 between January and today about how you found the</p> <p>24 15 names?</p> <p>25 A No.</p> <p style="text-align: right;">Page 182</p>	<p>1 YVETTE WANG</p> <p>2 A What's the question?</p> <p>3 Q Let me do this.</p> <p>4 Other than you and Mr. Guo, who else</p> <p>5 supplied suggestions for this list of 15 names?</p> <p>6 A Some of the name, like I remember one</p> <p>7 guy among there's 15, he is the head of Chinese</p> <p>8 communist party police. He personally go after</p> <p>9 Mr. Han and Mei, their family in China.</p> <p>10 Q So --</p> <p>11 A I was told -- I didn't finish.</p> <p>12 Q I'm sorry. Go ahead.</p> <p>13 A I was told and mentioned quite a long</p> <p>14 time about these bad guys. So if you ask me</p> <p>15 anyone else give any advice, you could understand</p> <p>16 Mr. Han and Mei. They all have input because they</p> <p>17 mention to me their family were persecuted and</p> <p>18 threatened by someone already in the list.</p> <p>19 Q You might recall that -- well, you</p> <p>20 attended every deposition, almost every deposition</p> <p>21 in this case. You attended Mr. Guo's deposition;</p> <p>22 didn't you?</p> <p>23 A I did.</p> <p>24 Q Yes, you did. And do you recall</p> <p>25 Mr. Guo did not recognize the last five names on</p> <p style="text-align: right;">Page 184</p>
<p>1 YVETTE WANG</p> <p>2 Q So what's the correct answer then?</p> <p>3 Did Mr. Guo provide the 15 names or did you find</p> <p>4 them on the Internet?</p> <p>5 MS. CLINE: Objection. Asked</p> <p>6 and answered. Argumentative.</p> <p>7 A This 15 names everyone can find out</p> <p>8 from Internet. Already a lot of whistle blower</p> <p>9 program or people mentioned them many times.</p> <p>10 Based on this, I put together a list. I asked</p> <p>11 advice from Mr. Guo, since he's the biggest</p> <p>12 whistle employer. He's able to provide a device.</p> <p>13 That's why I said me and Mr. Guo, we</p> <p>14 worked on the list. But I did not go through one</p> <p>15 by one the names with Mr. Han or Miss Mei because</p> <p>16 they authorize me and delegate Mr. Guo honest.</p> <p>17 I did not know whether Mr. Guo</p> <p>18 mentioned any of them name to Mr. Han or not. But</p> <p>19 for me I did not go through the name with Mr. Han.</p> <p>20 That is answer here. I never ask how did Eastern</p> <p>21 Profit identify individuals.</p> <p>22 Q Now I'm going to ask Eastern Profit</p> <p>23 for all the information it has on this. The</p> <p>24 question is how did it come up with the 15 names?</p> <p>25 MS. CLINE: Asked and answered.</p> <p style="text-align: right;">Page 183</p>	<p>1 YVETTE WANG</p> <p>2 the list. Do you recall that?</p> <p>3 A I don't remember that. You</p> <p>4 questioned him like more than eight hours almost.</p> <p>5 Q I didn't know I ran over my time. I</p> <p>6 didn't know that.</p> <p>7 So where did the last five names come</p> <p>8 from, if not from Mr. Guo?</p> <p>9 MS. CLINE: Objection. Asked</p> <p>10 and answered several times.</p> <p>11 A Can I say the names?</p> <p>12 Q Sure. I brought just one copy</p> <p>13 because it's somewhat voluminous. I will just</p> <p>14 give it to you. Take a look. This is your old</p> <p>15 Exhibit 12.</p> <p>16 A Thank you, Eddie. You're asking me</p> <p>17 five names?</p> <p>18 Q Yes. The last five names. You</p> <p>19 recall he had different answers on many of the</p> <p>20 names, but the last five he did not -- had not</p> <p>21 seen before and claimed not to have supplied those</p> <p>22 last five names.</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 Mischaracterizes the testimony.</p> <p>25 Q So my question is: Where did the</p> <p style="text-align: right;">Page 185</p>

47 (Pages 182 to 185)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 last five names come from?</p> <p>3 A Before I answer a question, Eddie,</p> <p>4 this pile was produced by Eastern before? Where</p> <p>5 did you get this?</p> <p>6 Q Hold on. Exhibit 12 was used at your</p> <p>7 deposition, and you testified that those are the</p> <p>8 names that you gave Strategic Vision. That's Wang</p> <p>9 Exhibit 12.</p> <p>10 A Can I see my transcript from my first</p> <p>11 deposition.</p> <p>12 Q Okay. Go to page 212, please.</p> <p>13 A 212.</p> <p>14 Q Look at the very bottom of 212 at</p> <p>15 line 23. Do you see my predecessor says: I'm</p> <p>16 going to hand you what has been marked as</p> <p>17 Exhibit 12 for your deposition.</p> <p>18 (Wang Exhibit 12, a Name List</p> <p>19 previously marked for Identification</p> <p>20 as of this date.)</p> <p>21 Answer: Thank you.</p> <p>22 Question: On the 213. Just flip</p> <p>23 through it and let me know when you're finished.</p> <p>24 It has production numbers SVUS 171 through 259.</p> <p>25 That's marked confidential and should remain</p> <p style="text-align: right;">Page 186</p>	<p>1 YVETTE WANG</p> <p>2 already Internet public information.</p> <p>3 Q Are there any names yet already</p> <p>4 whistle blown on the Internet?</p> <p>5 It might have been bad grammar there.</p> <p>6 A You talk about this?</p> <p>7 Q Yes, the 15 names.</p> <p>8 MS. CLINE: Objection to form.</p> <p>9 A What's your question, Eddie?</p> <p>10 Q The question was are there any names</p> <p>11 in there that Mr. Guo, any of the 15 names that</p> <p>12 Mr. Guo had not already whistle blow -- whistle</p> <p>13 blown about on the Internet?</p> <p>14 MS. CLINE: Objection to form.</p> <p>15 A I have to tell you this is not my</p> <p>16 documents.</p> <p>17 Q Okay. My question though is are</p> <p>18 there any names in the 15 names that were not</p> <p>19 already whistle blown by Mr. Guo on the Internet?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A The 15 names I gave to Wallop, which</p> <p>22 I produced to my previous lawyer, Zack. They are</p> <p>23 the name Mr. Guo whistle blown and other people</p> <p>24 whistle blown also.</p> <p>25 They are the 15 names which I</p> <p style="text-align: right;">Page 188</p>
<p>1 YVETTE WANG</p> <p>2 confidential.</p> <p>3 Question: Have you ever seen this</p> <p>4 document before?</p> <p>5 Your answer at line 9: Yes.</p> <p>6 Question: What is it?</p> <p>7 Answer: They are on the name list.</p> <p>8 Question: Where did it come from?</p> <p>9 Answer: Mr. Guo.</p> <p>10 Question: Where did Mr. Guo get it.</p> <p>11 Answer: I don't know.</p> <p>12 Question: Did you ever talk to him</p> <p>13 about it?</p> <p>14 Answer: No.</p> <p>15 Did I read that correctly?</p> <p>16 A Yes.</p> <p>17 Q Okay. So my question to you is where</p> <p>18 did the last -- first of all, is it still your</p> <p>19 testimony at that all 15 names came from Mr. Guo?</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 Mischaracterizes testimony.</p> <p>22 A Mr. Guo already whistle blown almost</p> <p>23 all of these name on Internet. If you want to</p> <p>24 understand, all the name came from Mr. Guo. I'm</p> <p>25 talking about 15 names. You're right. But it's</p> <p style="text-align: right;">Page 187</p>	<p>1 YVETTE WANG</p> <p>2 recognized my list. I was given, if this is still</p> <p>3 the same pile, by your previous, previous</p> <p>4 colleague, Phillip. I forget that law firm. That</p> <p>5 firm sue your client for not paying legal fee.</p> <p>6 That gentleman, he gave me this pile.</p> <p>7 Did he not allow me to go through all the pages.</p> <p>8 Q So does Eastern Profit now deny that</p> <p>9 these are the 15 names?</p> <p>10 A You should check my lawyer's records,</p> <p>11 which I gave my lawyer the 15 name and compare</p> <p>12 with this pile which you are given by your client.</p> <p>13 They are not match. This is not my files.</p> <p>14 Q What are the 15 names that you gave</p> <p>15 to Strategic Vision?</p> <p>16 A My lawyer should have that.</p> <p>17 Q Miss Wang, you testified in your</p> <p>18 first deposition that Exhibit 12 were the 15</p> <p>19 names. Now you're saying that they're not.</p> <p>20 MS. CLINE: Objection to form.</p> <p>21 A I'm not saying they are not. I'm</p> <p>22 telling you 15 names, and you should touch base</p> <p>23 with my lawyer with that 15 names. This is not my</p> <p>24 file.</p> <p>25 Q I'm not asking whether it's your</p> <p style="text-align: right;">Page 189</p>

48 (Pages 186 to 189)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 file. I'm asking whether it's the 15 names.</p> <p>3 A I can not testify on the file which</p> <p>4 is not my file. But I can confirm the 15 names</p> <p>5 which I gave my lawyer previously was Foley Hoag.</p> <p>6 Latter on was Zack. Right now it's Joanna. They</p> <p>7 have that 15 names. They are my name list which I</p> <p>8 will be able to testify.</p> <p>9 Q We're not going to call you back a</p> <p>10 third time. You've already sworn under oath that</p> <p>11 these are the 15 names. We can't keep doing this.</p> <p>12 So we will just rest on your prior sworn</p> <p>13 testimony. Let's --</p> <p>14 A It's very clear and all of this notes</p> <p>15 you already said it's not my notes, it's not my</p> <p>16 file, it's not mine.</p> <p>17 Q We'll have to decide what to do with</p> <p>18 this now changing testimony. I don't know what to</p> <p>19 do. I have no other records to show you.</p> <p>20 Have you brought anything for me</p> <p>21 showing what the 15 names are? Let's do this.</p> <p>22 Let me back up. Hold on.</p> <p>23 What does your list of the 15 names</p> <p>24 look like? Describe it to me.</p> <p>25 A Like the first name, yes, this is my</p> <p style="text-align: right;">Page 190</p>	<p>1 YVETTE WANG</p> <p>2 she believes the correct answer is,</p> <p>3 you're interrupting her having raised</p> <p>4 the topic yourself.</p> <p>5 So she can answer the question</p> <p>6 as best she's able.</p> <p>7 MR. GREIM: I asked her to be</p> <p>8 responsive, and nonresponsive</p> <p>9 descriptions are just a narrative.</p> <p>10 Q And just list the names for us</p> <p>11 please. So you've given us about five. Please</p> <p>12 keep going. I can't think of a better way to do</p> <p>13 this, so please go ahead.</p> <p>14 MS. CLINE: She's responding.</p> <p>15 Q Go ahead. Please continue.</p> <p>16 A Let me make this very clear. The 15</p> <p>17 name I give my lawyer, they may be included in</p> <p>18 this pile or not, which means I can help you to</p> <p>19 list I believe most of the name I listed, but</p> <p>20 maybe not all of them because I cannot repeat all</p> <p>21 of this pile. This is not my file. Okay?</p> <p>22 Shall I continue?</p> <p>23 Q Let me do this. Continue through the</p> <p>24 file, and I'm going to make sure I have your</p> <p>25 testimony as of today of who the 15 names were,</p> <p style="text-align: right;">Page 192</p>
<p>1 YVETTE WANG</p> <p>2 name on my list.</p> <p>3 MR. GREIM: The witness is</p> <p>4 pointing to the very first.</p> <p>5 A Yiu Suen, this is my name. Second</p> <p>6 name Yao Qing. This is on my name list. Jun</p> <p>7 Guan, this is on my name list. Liucheng Ije.</p> <p>8 Q L-I-U-C-H-E-N-G I-J-E. Got it.</p> <p>9 A This is Chinese Communist Party</p> <p>10 police hat which go after everyone.</p> <p>11 Q Hold on. Let me do this. We're</p> <p>12 getting a long narrative. Let's do question and</p> <p>13 answer, otherwise we'll never get through this.</p> <p>14 And so my question for you -- let's</p> <p>15 do this. I don't need you to tell me the story</p> <p>16 behind each name. I simply want to know what your</p> <p>17 15 names are. If you can rely on this document,</p> <p>18 we'll take your testimony and then we'll figure</p> <p>19 out discrepancy between your two different</p> <p>20 depositions.</p> <p>21 MS. CLINE: Let me interject.</p> <p>22 So you chose to raise this topic with</p> <p>23 her again, notwithstanding this was</p> <p>24 the testimony the first time around.</p> <p>25 She's now explaining to you what</p> <p style="text-align: right;">Page 191</p>	<p>1 YVETTE WANG</p> <p>2 but these were requested and should have been</p> <p>3 produced in discovery.</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 She's not saying it wasn't produced</p> <p>6 in discovery. She's saying that's</p> <p>7 not what you put in front of her.</p> <p>8 MR. GREIM: Well, I don't think</p> <p>9 she's saying it to me. This is</p> <p>10 Exhibit 12 that she testified to</p> <p>11 under oath before.</p> <p>12 Let's do this. Let's stop this.</p> <p>13 We have limited time, and I don't</p> <p>14 want to get multiple versions of</p> <p>15 this.</p> <p>16 Q My question was actually not to list</p> <p>17 the 15 names. My question relied upon your sworn</p> <p>18 testimony from January.</p> <p>19 Are there any names that did not come</p> <p>20 from you or Guo of the 15 names?</p> <p>21 A You mean my 15 names; right?</p> <p>22 Q The 15 names you provided to</p> <p>23 Strategic Vision.</p> <p>24 MS. CLINE: She's answering your</p> <p>25 question.</p> <p style="text-align: right;">Page 193</p>

49 (Pages 190 to 193)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A I reply you before, I believe, but I</p> <p>3 can repeat again. I put together name list. I</p> <p>4 took advice from Mr. Guo. I put together name</p> <p>5 list based on Internet whistle blow information.</p> <p>6 And I'm aware, like some of the bad guy, they go</p> <p>7 after Mr. Han and Miss Mei family in China.</p> <p>8 So if you won't say anyone put</p> <p>9 together that is my name list, I can tell you</p> <p>10 maximal there's people.</p> <p>11 Q Now originally there were to be 10</p> <p>12 names, and 5 were added; is that correct?</p> <p>13 A You're asking about negotiation of</p> <p>14 the contract terms?</p> <p>15 Q Yes, I am.</p> <p>16 A Kind of like, yes.</p> <p>17 Q What was the reason that five</p> <p>18 additional names were added? Let me ask you this.</p> <p>19 Did those five additional names have</p> <p>20 anything in common?</p> <p>21 A What do you mean in common?</p> <p>22 Q Well, for example did the same person</p> <p>23 recommend all five of the additional names?</p> <p>24 A The only thing --</p> <p>25 MS. CLINE: Objection to form.</p> <p style="text-align: right;">Page 194</p>	<p>1 YVETTE WANG</p> <p>2 than just to the best of your knowledge. I'm</p> <p>3 asking Eastern Profit.</p> <p>4 Did it engage anyone to research --</p> <p>5 anyone else other than Strategic Vision to</p> <p>6 research any of these 15 names?</p> <p>7 A Nope.</p> <p>8 Q What was the -- let me strike that.</p> <p>9 What was Eastern's plan for</p> <p>10 publicizing and using the information that</p> <p>11 Strategic Vision was supposed to obtain?</p> <p>12 A Of course to send this criminal</p> <p>13 person or criminal Chinese Communist Party</p> <p>14 officials into jail and to -- including Eastern</p> <p>15 Profit, the company, they're assets back.</p> <p>16 Q So Eastern Profit believed that the</p> <p>17 public outcry resulting from publicity would cause</p> <p>18 its assets to be unfrozen in Hong Kong?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A There are some words I don't</p> <p>21 understand in your sentence. Archive, what is</p> <p>22 that? What's your question?</p> <p>23 Q So Eastern Profit believed that the</p> <p>24 public outcry --</p> <p>25 A Wait a second. Public outcry, what's</p> <p style="text-align: right;">Page 196</p>
<p>1 YVETTE WANG</p> <p>2 Sorry. Go ahead.</p> <p>3 A The only thing in common is five</p> <p>4 names, and 10 name, 15 name, they're all corrupted</p> <p>5 Chinese Communist Party official, or their family,</p> <p>6 or their like kids. I don't know that words.</p> <p>7 Private case. And that is the only thing they're</p> <p>8 in common.</p> <p>9 Q Other than with ACA, is there any</p> <p>10 other -- and I guess Mr. Guo, was there any other</p> <p>11 person with whom Eastern Profit intended to share</p> <p>12 the research results?</p> <p>13 A What's the question?</p> <p>14 Q Other than ACA and Mr. Guo, was there</p> <p>15 any other person with whom Eastern Profit intended</p> <p>16 to share the research results?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Eastern, of course, is happy to share</p> <p>19 the results. It was all Chinese people who are</p> <p>20 pursuing the rule of law and democracy of China.</p> <p>21 Q Did Eastern Profit engage anyone to</p> <p>22 research any of these 15 names, anyone other than</p> <p>23 Strategic Vision to research the 15 names?</p> <p>24 A To best of my knowledge, no.</p> <p>25 Q Okay. Now I want to ask you more</p> <p style="text-align: right;">Page 195</p>	<p>1 YVETTE WANG</p> <p>2 this?</p> <p>3 Q You never heard outcry? Let me</p> <p>4 choose a different word?</p> <p>5 A Sorry. Foreigner here.</p> <p>6 MS. CLINE: No need for</p> <p>7 commentary.</p> <p>8 MR. GREIM: No one says she's a</p> <p>9 foreigner here. I don't understand</p> <p>10 the reason for the comment.</p> <p>11 MS. CLINE: She's not a native</p> <p>12 English speaking person.</p> <p>13 MR. GREIM: I'm trying to ask a</p> <p>14 question, please.</p> <p>15 Q So Eastern Profits?</p> <p>16 MR. GREIM: Please stop</p> <p>17 interrupting. Finally.</p> <p>18 Q So Eastern Profit's plan was that the</p> <p>19 public reaction to it's publicizing this</p> <p>20 information would cause it's assets to be unfrozen</p> <p>21 in Hong Kong?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 A Eastern Profits believes to</p> <p>24 disclosure this corrupted Chinese official, bring</p> <p>25 the justice to Chinese people, and itself also.</p> <p style="text-align: right;">Page 197</p>

50 (Pages 194 to 197)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 We'll be able to help all the Chinese</p> <p>3 people and itself, including I'm frozen, Eastern</p> <p>4 itself assets and back to normal business, which</p> <p>5 Eastern was conducting before their bank accounts</p> <p>6 was frozen.</p> <p>7 Q So I just want to understand this.</p> <p>8 This is the first time we're hearing about Eastern</p> <p>9 Profit wanting to unfreeze its assets.</p> <p>10 Did Eastern Profit believe that it</p> <p>11 would put its own prosecutors in jail in Hong</p> <p>12 Kong? Let me ask you this.</p> <p>13 What was Eastern Profit's specific</p> <p>14 plan to use the research in Hong Kong?</p> <p>15 MS. CLINE: Objection. It's</p> <p>16 Beyond the scope of your topics.</p> <p>17 Q Well, the very first topic is why did</p> <p>18 Eastern Profit enter into the contract. Question</p> <p>19 number 1. That's what we're trying to find out.</p> <p>20 We just learned it's to unfreeze its</p> <p>21 assets. So I would like to know about the</p> <p>22 specifics of this.</p> <p>23 How specifically did Eastern Profit</p> <p>24 believe it was going to be able to use the</p> <p>25 research results to unfreeze it's Hong Kong</p> <p style="text-align: right;">Page 198</p>	<p>1 YVETTE WANG</p> <p>2 appearing on the list is why did EP</p> <p>3 enter into the contract. The second</p> <p>4 sentence is: What circumstances led</p> <p>5 EP to seek research.</p> <p>6 MR. PODHASKIE: Join. I'm --</p> <p>7 MR. GREIM: Please do not enter</p> <p>8 into the record.</p> <p>9 MS. CLINE: Which is the letter</p> <p>10 you're referring to?</p> <p>11 MR. GREIM: I'll just give you</p> <p>12 a copy. This is my E-mail to you of</p> <p>13 October 3rd, 2019. I attached a word</p> <p>14 document. You can pass it over to</p> <p>15 your attorney.</p> <p>16 Let's go off the record.</p> <p>17 MS. CLINE: No. Let's keep</p> <p>18 going.</p> <p>19 MR. GREIM: We're using up time</p> <p>20 now. I think it's a spurious</p> <p>21 objection.</p> <p>22 THE VIDEOGRAPHER: Off the</p> <p>23 record.</p> <p>24 MS. CLINE: On the record.</p> <p>25 Q So the question is: What was Eastern</p> <p style="text-align: right;">Page 200</p>
<p>1 YVETTE WANG</p> <p>2 assets?</p> <p>3 MS. CLINE: What was the</p> <p>4 number 1 that you were just referring</p> <p>5 to?</p> <p>6 MR. GREIM: I'm referring you to</p> <p>7 the long list, item 1, very first</p> <p>8 question sent to you on August 13.</p> <p>9 MS. CLINE: You're not referring</p> <p>10 to the deposition notice; right?</p> <p>11 MR. GREIM: No. Within the</p> <p>12 deposition notice it's under research</p> <p>13 agreement including negotiations</p> <p>14 concerning the same.</p> <p>15 Question 1: Why did EP enter</p> <p>16 into the contract?</p> <p>17 MS. CLINE: I mean the notice</p> <p>18 topic is the research agreement and</p> <p>19 negotiations. I will give you a</p> <p>20 little leeway.</p> <p>21 MR. GREIM: We're in between</p> <p>22 counsel, which is supposed to be</p> <p>23 honored by the court's order, which I</p> <p>24 sent to you October 3rd is this list.</p> <p>25 And the very first question</p> <p style="text-align: right;">Page 199</p>	<p>1 YVETTE WANG</p> <p>2 Profit's specific plan to use the research to free</p> <p>3 up its Hong Kong assets?</p> <p>4 MS. CLINE: You're representing</p> <p>5 that that question isn't on here?</p> <p>6 MR. GREIM: No. It's the first</p> <p>7 two questions.</p> <p>8 Q Why did Eastern Profit enter into the</p> <p>9 contract? You just learned for the first time</p> <p>10 that it's to free up some frozen Hong Kong.</p> <p>11 I'm trying to learn about the</p> <p>12 specific plan that Eastern Profit had.</p> <p>13 MS. CLINE: You're</p> <p>14 mischaracterizing her testimony. If</p> <p>15 you want to know why did Eastern</p> <p>16 Profit enter into the contract, you</p> <p>17 can ask her that question again.</p> <p>18 You're twisting --</p> <p>19 MR. GREIM: I'm not limited to</p> <p>20 using the exact words on that</p> <p>21 document. I'm following up on the</p> <p>22 witness' questioning, and I'm being</p> <p>23 obstructed.</p> <p>24 I would like to get an answer to</p> <p>25 the question.</p> <p style="text-align: right;">Page 201</p>

51 (Pages 198 to 201)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q What was Eastern Profit's specific</p> <p>3 plan to use the research results to unfreeze its</p> <p>4 Hong Kong assets?</p> <p>5 MS. CLINE: Objection to form.</p> <p>6 Mischaracterizes testimony and beyond</p> <p>7 the scope of counsel's agreement</p> <p>8 regarding the scope of the</p> <p>9 deposition.</p> <p>10 You can answer.</p> <p>11 A I'm happy to tell you. I remember on</p> <p>12 my name list there are two person. One is called</p> <p>13 M-E-N-G, J-I-A-N, Z-H-U. He was the hat or steel</p> <p>14 head of entire China, police, court, persecutor.</p> <p>15 Almost -- most of the law enforcement. He's the</p> <p>16 head of that. The most powerful person. One of</p> <p>17 the most powerful person in China.</p> <p>18 Q And so you hoped --</p> <p>19 A Let me finish.</p> <p>20 Q You paused for so long, I thought you</p> <p>21 were done.</p> <p>22 A I'm trying to help you.</p> <p>23 Q I'm sorry. Keep going.</p> <p>24 A I told you I have language barrier.</p> <p>25 You have to allow me finish.</p> <p style="text-align: right;">Page 202</p>	<p>1 YVETTE WANG</p> <p>2 sorry, PRC official?</p> <p>3 A He is Chinese Communist Party</p> <p>4 official, yes.</p> <p>5 Q So that's one person. You said there</p> <p>6 was a second person. Who was that?</p> <p>7 A The second person is Sun Li Jum.</p> <p>8 S-U-N, L-I, J-U-M.</p> <p>9 Q Okay. Go ahead.</p> <p>10 A I finished.</p> <p>11 Q I'm sorry. That time you were done.</p> <p>12 Okay.</p> <p>13 What was the plan with respect to</p> <p>14 him? How was that going to unfreeze the assets?</p> <p>15 A A similar plan.</p> <p>16 Q Anyone else in your list of 15 names</p> <p>17 that were going to help unfreeze the Eastern</p> <p>18 Profit assets in Hong Kong?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 A Everyone.</p> <p>21 Q Okay. How were ACA assets able to</p> <p>22 flow out of Hong Kong?</p> <p>23 MS. CLINE: Objection. Beyond</p> <p>24 the scope.</p> <p>25 MR. GREIM: Let's take a short</p> <p style="text-align: right;">Page 204</p>
<p>1 YVETTE WANG</p> <p>2 Q I thought you were finished with the</p> <p>3 sentence when a few second ticked by. Go on</p> <p>4 ahead.</p> <p>5 A So clearly of Eastern's previous</p> <p>6 directors, current directors, they were all</p> <p>7 persecuted by this corrupted Chinese official.</p> <p>8 So Eastern would like to disclosure</p> <p>9 this corrupted Chinese official. His legal</p> <p>10 assets, his crimes, et cetera to bring the justice</p> <p>11 to China.</p> <p>12 And it should be a natural</p> <p>13 understanding to Eastern and all the Chinese</p> <p>14 people who are persecuted by this bad official.</p> <p>15 If this official is completely</p> <p>16 removed, sent to jail, and they will be able to</p> <p>17 get their justice back including -- you know the</p> <p>18 relationship between Hong Kong and Beijing; right?</p> <p>19 You don't need me to explain that. That will</p> <p>20 naturally bring justice to Hong Kong for Eastern</p> <p>21 Profit to release his assets which were illegally</p> <p>22 frozen.</p> <p>23 Q In Hong Kong?</p> <p>24 A Correct.</p> <p>25 Q And this Mr. Meng is a CCP or, I'm</p> <p style="text-align: right;">Page 203</p>	<p>1 YVETTE WANG</p> <p>2 break.</p> <p>3 THE VIDEOGRAPHER: The time is</p> <p>4 4:39 p.m., Wednesday, October 30,</p> <p>5 2019. This is the end of Media 4 in</p> <p>6 the deposition of Yvette Wang.</p> <p>7 We're off the record.</p> <p>8 (At this time, a brief recess</p> <p>9 was taken.)</p> <p>10 THE VIDEOGRAPHER: The time is</p> <p>11 4:56 p.m., Wednesday, October 30,</p> <p>12 2019.</p> <p>13 This is media number 5 of the</p> <p>14 videotaped deposition of Missy Wong.</p> <p>15 We're back on the record.</p> <p>16 EXAMINATION CONTINUED</p> <p>17 BY MR. GREIM:</p> <p>18 Q Miss Wong, we're going to jump around</p> <p>19 a little bit between some different topics and try</p> <p>20 to wrap up today.</p> <p>21 My first question is earlier we</p> <p>22 talked about the Power of Attorney by which</p> <p>23 Eastern Profit granted to Gold Spring, New York.</p> <p>24 My question for you is who on behalf</p> <p>25 of Eastern Profit authorized Han Chunguang to</p> <p style="text-align: right;">Page 205</p>

52 (Pages 202 to 205)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 sign that Power of Attorney?</p> <p>3 MS. CLINE: Objection. I'm not</p> <p>4 sure that's within the scope.</p> <p>5 If you know the answer, you can</p> <p>6 answer.</p> <p>7 A I have, I believe, Miss Mei. M-E-I.</p> <p>8 Q Were any lenders, other than ACA,</p> <p>9 approached by Eastern Profit for purposes of this</p> <p>10 contract?</p> <p>11 MS. CLINE: Again, objection.</p> <p>12 Beyond the scope.</p> <p>13 A I didn't hear about that.</p> <p>14 Q In other words, did ACA try to find a</p> <p>15 competitive -- find competitive loan terms?</p> <p>16 A Find competitive loan terms?</p> <p>17 Q Right. In other words, did it see if</p> <p>18 it could find cheaper financing from somebody</p> <p>19 other than ACA?</p> <p>20 A You're asking do I know or not?</p> <p>21 Q My question is did Eastern Profit try</p> <p>22 to shop for the best loan terms it could?</p> <p>23 A I didn't hear about this.</p> <p>24 Q Does Eastern Profit have any plan to</p> <p>25 repay the loan other than getting its assets</p> <p style="text-align: right;">Page 206</p>	<p>1 YVETTE WANG</p> <p>2 So besides Eastern is looking for</p> <p>3 release their bank accounts from Hong Kong to pay</p> <p>4 back the loan, is there any other way Eastern</p> <p>5 planned to pay back?</p> <p>6 Q Correct.</p> <p>7 A Okay. I didn't discuss that yet, but</p> <p>8 I heard kind of like William would be happy to</p> <p>9 contribute this fund into the entire taking down</p> <p>10 Chinese Communist Party campaign. But I don't</p> <p>11 have too much details.</p> <p>12 Q So had the research been successful,</p> <p>13 Mr. Yu would have been happy to write off the</p> <p>14 loan?</p> <p>15 MS. CLINE: Objection to form.</p> <p>16 A Possible.</p> <p>17 Q Did Eastern Profit intend to keep</p> <p>18 borrowing from ACA for the rest of the contract?</p> <p>19 MS. CLINE: Objection to the</p> <p>20 form.</p> <p>21 A I think I replied to your question.</p> <p>22 Still the same answer. Possible.</p> <p>23 Q Did Eastern Profit hire T and M</p> <p>24 Security to research these names, any of these 15</p> <p>25 names?</p> <p style="text-align: right;">Page 208</p>
<p>1 YVETTE WANG</p> <p>2 unfrozen in Hong Kong?</p> <p>3 MS. CLINE: Objection to form.</p> <p>4 A What do you mean other than assets?</p> <p>5 Q Let me go back.</p> <p>6 So let's suppose that Strategic</p> <p>7 Vision -- I asked a question, not the same</p> <p>8 question, but a similar one earlier.</p> <p>9 Let's suppose Strategic Vision had</p> <p>10 given Eastern Profit all of the research it wanted</p> <p>11 for an entire year, for the entire term of the</p> <p>12 contract. Let's say that it happened.</p> <p>13 Did Eastern Profit have any plan to</p> <p>14 repay ACA's loan other than by effecting political</p> <p>15 change in China?</p> <p>16 MS. CLINE: Objection to form.</p> <p>17 Hypothetical.</p> <p>18 You can answer, if you can.</p> <p>19 A It's hard to understand your</p> <p>20 question. Still I don't quite understand your</p> <p>21 question. You mean F, Strategic Vision, they</p> <p>22 are -- which they are not, they are qualified to</p> <p>23 deliver the reports which agreed in the contract,</p> <p>24 which means the contract happened. I mean with</p> <p>25 merits or with facts happened.</p> <p style="text-align: right;">Page 207</p>	<p>1 YVETTE WANG</p> <p>2 A No.</p> <p>3 Q Did it hire Robert Tucker or Dunkin</p> <p>4 Levitt to research any of these 15 names?</p> <p>5 A No.</p> <p>6 Q Did Eastern Profit expend any money</p> <p>7 in coming up with its list of 15 names?</p> <p>8 A I don't understand the question.</p> <p>9 Sorry.</p> <p>10 Q Did Eastern Profit -- so you've</p> <p>11 testified that you and Mr. Guo came up with a list</p> <p>12 of 15 names, and that you considered various</p> <p>13 factors.</p> <p>14 My question to you is did Eastern</p> <p>15 Profit spend any money in developing its list of</p> <p>16 15 names?</p> <p>17 MS. CLINE: Objection to form.</p> <p>18 A Spend any money in developing my name</p> <p>19 at least; right?</p> <p>20 Q Correct.</p> <p>21 A If you are talking about Eastern's</p> <p>22 assets were frozen, they could not continue their</p> <p>23 normal business. The damage should be count as</p> <p>24 cost to spend.</p> <p>25 Q I'm sorry. My question was did</p> <p style="text-align: right;">Page 209</p>

53 (Pages 206 to 209)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Eastern Profit spend money in developing the list</p> <p>3 of 15 names?</p> <p>4 MS. CLINE: Objection to form.</p> <p>5 A I don't know, but I will say no.</p> <p>6 Q Did Eastern Profit spend any money to</p> <p>7 develop the supporting materials it provided to</p> <p>8 Strategic Vision along with the 15 names?</p> <p>9 MS. CLINE: Objection to form.</p> <p>10 A The 15 names, they are public,</p> <p>11 international. No, international information.</p> <p>12 Why Eastern Profits should spend money to the</p> <p>13 American names, should spend money to build the</p> <p>14 list.</p> <p>15 Q That's my question to you. Did it?</p> <p>16 A I believe I reply to your question</p> <p>17 with my question.</p> <p>18 Q But I would like an answer.</p> <p>19 MS. CLINE: Asked and answered.</p> <p>20 A No. It's public Internet</p> <p>21 information. Let me repeat again. Everyone has</p> <p>22 access.</p> <p>23 Q Was Eastern Profit aware that Guo had</p> <p>24 hired researchers to investigate the same 15 names</p> <p>25 that Strategic Vision was researching?</p> <p style="text-align: right;">Page 210</p>	<p>1 YVETTE WANG</p> <p>2 Wallop to have Strategic Vision send the money</p> <p>3 back to ACA?</p> <p>4 A Yes. I asked Wallop.</p> <p>5 Q Why did you ask her to send the money</p> <p>6 back to ACA instead of to Eastern Profit?</p> <p>7 MS. CLINE: Objection. To the</p> <p>8 extent all this stuff was asked in</p> <p>9 the first deposition, and now we're</p> <p>10 reinventing wheels again.</p> <p>11 You can answer.</p> <p>12 A Eastern Profits bank account is</p> <p>13 frozen. How can Eastern be able to receive</p> <p>14 refund, return, let's say. Sorry about my</p> <p>15 language. Return of money.</p> <p>16 Q What is the latest conversation</p> <p>17 you've had with ACA or William Je about the</p> <p>18 million dollars?</p> <p>19 MS. CLINE: Objection. Asked</p> <p>20 and answered.</p> <p>21 A Latest conversation, you mean the</p> <p>22 last conversation today?</p> <p>23 Q The most recent, yes.</p> <p>24 A Last month.</p> <p>25 Q Okay.</p> <p style="text-align: right;">Page 212</p>
<p>1 YVETTE WANG</p> <p>2 MS. CLINE: Objection to form.</p> <p>3 Assumes facts not in evidence.</p> <p>4 A No.</p> <p>5 Q By the way, some of the accompanying</p> <p>6 information in the 15 names that Eastern Profit</p> <p>7 gave to Strategic Vision included birthdays,</p> <p>8 passport numbers, Social Security numbers.</p> <p>9 Is it your testimony that all that</p> <p>10 information was already on the Internet?</p> <p>11 A Correct. You can try.</p> <p>12 Q You recall an attempt to retract the</p> <p>13 two \$500,000 wires that ACA sent to Strategic</p> <p>14 Vision?</p> <p>15 A How much money?</p> <p>16 Q Two \$500,000 wires for a total of</p> <p>17 \$1 million.</p> <p>18 Do you recall an attempt to retract</p> <p>19 those wires?</p> <p>20 A \$250,000.</p> <p>21 Q No. Two \$500,000 wires.</p> <p>22 A Oh. Two half million; right?</p> <p>23 Q Correct?</p> <p>24 A Yes, I remember it.</p> <p>25 Q And do you recall asking French</p> <p style="text-align: right;">Page 211</p>	<p>1 YVETTE WANG</p> <p>2 A Or yeah, like a month ago or a month</p> <p>3 and a half, yeah.</p> <p>4 Q Have you spoken with anyone other</p> <p>5 than William Je at ACA about the loan?</p> <p>6 A Nope.</p> <p>7 Q A few of the people we've been</p> <p>8 talking about today here, for one, William Je,</p> <p>9 where does he reside?</p> <p>10 MS. CLINE: Objection. Again,</p> <p>11 this is a 30(b)(6) of the Eastern</p> <p>12 Profit designee. We specifically had</p> <p>13 an agreement that we would not go</p> <p>14 into ACA, it's corporate structure or</p> <p>15 anything like that, and you know it.</p> <p>16 This is way outside the scope of our</p> <p>17 agreement.</p> <p>18 MR. GREIM: It sounds like he is</p> <p>19 a witness. And if you want to</p> <p>20 instruct the witness not to answer</p> <p>21 because it's outside the scope of the</p> <p>22 agreement, so be it. I can't make --</p> <p>23 MS. CLINE: He's outside the</p> <p>24 scope.</p> <p>25 Q What about Guo Mei, is she in the</p> <p style="text-align: right;">Page 213</p>

54 (Pages 210 to 213)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 United States, the director of -- the sole</p> <p>3 director of Eastern Profit, is she in this</p> <p>4 country?</p> <p>5 MS. CLINE: I object to that.</p> <p>6 That's not relevant to anything</p> <p>7 that's within the scope.</p> <p>8 Q We know now that she has relevant</p> <p>9 information. We just learned today for the first</p> <p>10 time.</p> <p>11 I'd like to know whether the director</p> <p>12 of Eastern Profit, the top dog, is in the United</p> <p>13 States. Is she?</p> <p>14 A What do you mean top dog?</p> <p>15 Q Forget it. I'm sorry.</p> <p>16 Is Guo Mei in the United States?</p> <p>17 A I don't know.</p> <p>18 Q Does she reside in New York?</p> <p>19 A I don't know.</p> <p>20 Q When was the last time you reported</p> <p>21 to her about this case?</p> <p>22 MS. CLINE: Objection to the</p> <p>23 form.</p> <p>24 A Report? What do you mean report?</p> <p>25 Q When is the last time you talked to</p> <p style="text-align: right;">Page 214</p>	<p>1 YVETTE WANG</p> <p>2 drive with files on there; correct? It was in a</p> <p>3 PDF; wasn't it?</p> <p>4 A Correct.</p> <p>5 Q Who created the PDF?</p> <p>6 A I did.</p> <p>7 Q And did you cut and paste from the</p> <p>8 Internet, did you create a word document and print</p> <p>9 it to PDF.</p> <p>10 How did you create the PDF?</p> <p>11 A You're asking how did I create a PDF?</p> <p>12 Q Yes.</p> <p>13 A I don't remember that either like</p> <p>14 word or PowerPoint, and then transfer.</p> <p>15 Q All of the information that you</p> <p>16 included in the document that eventually became a</p> <p>17 PDF was information that you found on the</p> <p>18 Internet?</p> <p>19 A What's the question?</p> <p>20 Q All of the information that you</p> <p>21 included on the document that eventually became</p> <p>22 the PDF was information you found on the Internet?</p> <p>23 A Devised by Mr. Guo.</p> <p>24 Q Did Mr. Guo provide you any data that</p> <p>25 you included into the PDF document?</p> <p style="text-align: right;">Page 216</p>
<p>1 YVETTE WANG</p> <p>2 her about this case?</p> <p>3 A That should be in dinner,</p> <p>4 D-I-N-N-E-R.</p> <p>5 Q That was the earlier summer dinner;</p> <p>6 right?</p> <p>7 A Correct.</p> <p>8 Q That was in New York City?</p> <p>9 A Yes.</p> <p>10 Q You supplied the names to Strategic</p> <p>11 Vision in an electronic file; is that right?</p> <p>12 A Electronic files, correct.</p> <p>13 Q On a thumb drive?</p> <p>14 A USB, yes.</p> <p>15 Q Right. Now who prepared that thumb</p> <p>16 drive?</p> <p>17 A I did.</p> <p>18 Q Where did you get the files that went</p> <p>19 on the thumb drive?</p> <p>20 A From Internet. I told you, Ed.</p> <p>21 Q Okay. So you found files on the</p> <p>22 Internet. Were they PDFs?</p> <p>23 A They are information on Internet, a</p> <p>24 lot.</p> <p>25 Q But you actually produced a thumb</p> <p style="text-align: right;">Page 215</p>	<p>1 YVETTE WANG</p> <p>2 A What do you mean data?</p> <p>3 Q Information. Let's call it</p> <p>4 information.</p> <p>5 A I don't remember that, because all</p> <p>6 the name, they're all Internet public information.</p> <p>7 Q So the information on Social Security</p> <p>8 numbers, driver's license numbers, you just pulled</p> <p>9 all those off the Internet and put them into the</p> <p>10 PDF document?</p> <p>11 A I don't remember I have driver's</p> <p>12 license information. I don't remember I have</p> <p>13 that.</p> <p>14 Q But regardless of what's in there,</p> <p>15 your testimony is it all came from the Internet?</p> <p>16 A Correct.</p> <p>17 Q Did anyone else have physical custody</p> <p>18 of the PDF file or the thumb drive before you</p> <p>19 delivered it to Strategic Vision?</p> <p>20 A What do you mean physical custody?</p> <p>21 Q Do they have it?</p> <p>22 A No.</p> <p>23 Q Did anyone else have an opportunity</p> <p>24 to add or subtract names or information?</p> <p>25 A Subtract? What do you mean subtract?</p> <p style="text-align: right;">Page 217</p>

55 (Pages 214 to 217)

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 Q Take away.</p> <p>3 A You mean before I gave to Wallop?</p> <p>4 Q Yes.</p> <p>5 A I don't think so.</p> <p>6 Q Did Eastern Profit plan to share the</p> <p>7 existence of the research agreement or any of its</p> <p>8 results with anyone in the CCP?</p> <p>9 A You're asking about Eastern; right?</p> <p>10 You're asking about Eastern; right?</p> <p>11 Q Correct. I didn't hear that from</p> <p>12 Eastern.</p> <p>13 Did ACA tell Easter that it planned</p> <p>14 to share the contract's existence or any of the</p> <p>15 rules of the research with the CCP?</p> <p>16 MS. CLINE: Again, the agreement</p> <p>17 we had as to ACA, it's irrelevant.</p> <p>18 The agreement we had with ACA had to</p> <p>19 do with the loan, the negotiation of</p> <p>20 the loan, the drafting of the</p> <p>21 document. This is beyond the scope.</p> <p>22 MR. GREIM: The intended sharing</p> <p>23 of the results of the research is</p> <p>24 within the scope.</p> <p>25 MS. CLINE: Not with respect to</p> <p style="text-align: right;">Page 218</p>	<p>1 YVETTE WANG</p> <p>2 in Hong Kong about the negotiation of the research</p> <p>3 contract?</p> <p>4 MS. CLINE: Objection to the</p> <p>5 form.</p> <p>6 A About research agreement?</p> <p>7 Q Right.</p> <p>8 A Who did I communicate with Hong Kong?</p> <p>9 Q Right.</p> <p>10 A I don't remember I talk with anyone</p> <p>11 in Hong Kong about this agreement. I don't</p> <p>12 remember now.</p> <p>13 Q Do you recall telling Miss Wallop</p> <p>14 that you had to check with Hong Kong on the</p> <p>15 contract negotiations?</p> <p>16 A Can I see the transcript?</p> <p>17 Q We don't have a recording of you</p> <p>18 talking to Miss Wallop.</p> <p>19 A I don't remember I say that.</p> <p>20 Q Do you recall that you said that</p> <p>21 rather than reporting to Mr. Guo, you report to</p> <p>22 Golden Spring, Hong Kong?</p> <p>23 A Can I see the transcript?</p> <p>24 Q You may. If you look at page 20.</p> <p>25 A My first transcript; right?</p> <p style="text-align: right;">Page 220</p>
<p>1 YVETTE WANG</p> <p>2 ACA.</p> <p>3 MR. GREIM: No. No. There's</p> <p>4 not a special carve out that ACA is</p> <p>5 going to share the results. We don't</p> <p>6 get asked about it.</p> <p>7 Q Did ACA indicate that to Eastern</p> <p>8 Profit?</p> <p>9 MS. CLINE: Same objection.</p> <p>10 A I never hear about this. Why?</p> <p>11 Q Do you recall telling Mr. Waller that</p> <p>12 you were conferring with investors into the</p> <p>13 research project?</p> <p>14 A Yes, I did.</p> <p>15 Q Who were those investors?</p> <p>16 MS. CLINE: The scope of the</p> <p>17 questioning is limited to investors</p> <p>18 in this research contract.</p> <p>19 A I refer the people who are persecuted</p> <p>20 and threatened by Chinese Communist Party.</p> <p>21 Q Because those people were going to be</p> <p>22 receiving the results of the research?</p> <p>23 MS. CLINE: Objection to form.</p> <p>24 A I didn't say that.</p> <p>25 Q Okay. Who did you communicate with</p> <p style="text-align: right;">Page 219</p>	<p>1 YVETTE WANG</p> <p>2 Q Correct. Line 6.</p> <p>3 Question: Does Mr. Guo tell you what</p> <p>4 to do when you're working on behalf of Golden</p> <p>5 Spring?</p> <p>6 Answer: No.</p> <p>7 Question: Who does?</p> <p>8 Answer: China Golden Spring Group,</p> <p>9 Hong Kong, Limited.</p> <p>10 Question: Where are they located?</p> <p>11 Answer: Hong Kong.</p> <p>12 Did I read that correctly?</p> <p>13 A Yes.</p> <p>14 MS. CLINE: I lodge an objection</p> <p>15 to the line of inquiry. These are</p> <p>16 questions that relate to her capacity</p> <p>17 as a representative of Golden Spring.</p> <p>18 She's here as a representative of</p> <p>19 Eastern Profit.</p> <p>20 Q Right. Your testimony before was on</p> <p>21 behalf of Eastern Profit; correct? 30(b)(6) on</p> <p>22 behalf of Eastern Profit?</p> <p>23 A You're talking about today?</p> <p>24 Q No. In January when you testified</p> <p>25 what I just read to you.</p> <p style="text-align: right;">Page 221</p>

56 (Pages 218 to 221)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>1 YVETTE WANG</p> <p>2 A Are you talking about first</p> <p>3 deposition?</p> <p>4 Q Yes. Do you recall that you were a</p> <p>5 30(b)(6) witness before?</p> <p>6 A I should be.</p> <p>7 Q Did you confer with Mr. Je, I say it</p> <p>8 different every time, about the research agreement</p> <p>9 in this case in December of 2017?</p> <p>10 A December of 2017 Mr. Je?</p> <p>11 Q Correct.</p> <p>12 A Who is Mr. Je?</p> <p>13 Q Well, Mr. Yu.</p> <p>14 A You're talking about William.</p> <p>15 Q I am. William. I should just call</p> <p>16 him William probably.</p> <p>17 A Much easier. Talk to him about what?</p> <p>18 Q About the research agreement?</p> <p>19 A I didn't remember that.</p> <p>20 Q How about in January, 2018?</p> <p>21 MS. CLINE: Again, our agreement</p> <p>22 regarding the scope of questioning</p> <p>23 about ACA was limited to the</p> <p>24 negotiations of the loan.</p> <p>25 Q My question is is one of the people</p> <p style="text-align: right;">Page 222</p>	<p>1 YVETTE WANG</p> <p>2 A Ask William by when, January 2018?</p> <p>3 Q Sure. December, 2017 or January,</p> <p>4 2018.</p> <p>5 A I don't remember.</p> <p>6 Q Does Eastern Profit report on the</p> <p>7 progress of this case to William Yu?</p> <p>8 MS. CLINE: Objection. Form.</p> <p>9 A Does Eastern Profit? If you are</p> <p>10 talking about the previous director and the</p> <p>11 current director, no, because these two people</p> <p>12 fully authorized everything to me. They don't</p> <p>13 know the details. They're not involved. If you</p> <p>14 are talking about me, mention what to William?</p> <p>15 Q The progress of this case.</p> <p>16 A Yeah, I mentioned the progress of</p> <p>17 this case to him. Yeah.</p> <p>18 MR. GREIM: Can I ask -- I think</p> <p>19 I'm done here.</p> <p>20 Can I ask that the witness</p> <p>21 produce her copy of the 15 names to</p> <p>22 counsel and that they just be</p> <p>23 produced to us?</p> <p>24 MS. CLINE: We will take that</p> <p>25 under advisement?</p> <p style="text-align: right;">Page 224</p>
<p>1 YVETTE WANG</p> <p>2 that you were conferring with for direction as you</p> <p>3 were negotiating the contract with Strategic</p> <p>4 Vision William Yu?</p> <p>5 A Conferring what? I --</p> <p>6 Q Talking to.</p> <p>7 A Okay. Talking to William about.</p> <p>8 Q Correct, the research.</p> <p>9 A The research agreement.</p> <p>10 Q Right.</p> <p>11 A When? By January --</p> <p>12 Q January, 2018.</p> <p>13 A 2018.</p> <p>14 Q Yes.</p> <p>15 A I don't remember.</p> <p>16 Q Did you ask for his advice in any of</p> <p>17 the 15 names?</p> <p>18 A Ask William; right?</p> <p>19 Q Correct.</p> <p>20 A No.</p> <p>21 Q Did you check with him to determine</p> <p>22 whether getting information on these names would</p> <p>23 help to unfreeze Eastern Profit's assets in Hong</p> <p>24 Kong?</p> <p>25 MS. CLINE: Objection.</p> <p style="text-align: right;">Page 223</p>	<p>1 MR. GREIM: Okay.</p> <p>2 I know what you've said here</p> <p>3 today, but I believe that was what we</p> <p>4 had. I'll just make the request and</p> <p>5 you can take it under advisement.</p> <p>6 I don't have any other questions</p> <p>7 for the witness.</p> <p>8 We're off the record. The</p> <p>9 deposition is concluded.</p> <p>10 THE VIDEOGRAPHER: The time is</p> <p>11 5:28 p.m. Wednesday, October 30,</p> <p>12 2019. This is the end of media</p> <p>13 number 5 and completes the videotaped</p> <p>14 deposition of Miss Yvette Wang.</p> <p>15 We're off the record.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 225</p>

57 (Pages 222 to 225)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

<p>2</p> <p>3 A C K N O W L E D G M E N T</p> <p>4</p> <p>5 STATE OF NEW YORK)</p> <p>6 ss:</p> <p>7 COUNTY OF _____)</p> <p>8</p> <p>9 I, Yvette Wang, hereby certify that I have</p> <p>10 read the transcript of my testimony taken under</p> <p>11 oath in my deposition of October 30, 2019; that</p> <p>12 the transcript is a true and complete record of my</p> <p>13 testimony, and that the answers on the record as</p> <p>14 given by me are true and correct.</p> <p>15</p> <p>16</p> <p>17 _____</p> <p>18 YVETTE WANG</p> <p>19</p> <p>20</p> <p>21 Subscribed and sworn to before me</p> <p>22 This day of 2019</p> <p>23 _____</p> <p>24 (NOTARY PUBLIC)</p> <p>25</p> <p style="text-align: right;">Page 226</p>	
<p>2</p> <p>3 C E R T I F I C A T E</p> <p>4</p> <p>5 I, Terri Fudens, a stenotype reporter</p> <p>6 and Notary Public within and for the State of New</p> <p>7 York, do hereby certify:</p> <p>8 That the witness whose testimony is</p> <p>9 hereinbefore set forth was duly sworn by me and</p> <p>10 that such testimony is a true record of the</p> <p>11 testimony given by such witness.</p> <p>12 I further certify that I am not related</p> <p>13 to any of the parties by blood or marriage, and</p> <p>14 that I am in no way interested in the outcome of</p> <p>15 this matter.</p> <p>16 IN WITNESS WHEREOF, I have hereunto set</p> <p>17 my hand.</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____</p> <p>22 Terri Fudens</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 227</p>	

58 (Pages 226 to 227)

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 1

A				
<p>A-V-R-A 127:14 a.m 2:21 13:20 62:19 63:3 a/k/a 1:10 able 24:18 53:3 66:17,18 89:24 183:12 190:8 192:6 198:2,24 203:16 204:21 212:13 ACA 38:2,3,4,17 39:20 40:4,12,20 42:5,7 43:12,19,20 44:4,9,11 44:15,20,25 45:5,10 50:17 51:3,5,11,24 53:21 55:14 57:20 60:21 63:15 64:2,22 65:12,17 69:24 70:24 71:12,21 73:9,14,21 89:5 90:8,12,17 92:9 94:16 99:19 102:10,11 103:12 104:23 105:4 105:12 107:22 110:11 110:18 111:13,16,23 112:2 115:3,7,10,14 116:3,7,10,23 118:4 118:12 119:4 123:13 125:19 126:15 127:18 130:24 131:10 132:5 132:10 133:9 137:6 195:9,14 204:21 206:8 206:14,19 208:18 211:13 212:3,6,17 213:5,14 218:13,17,18 219:2,4,7 222:23 ACA's 115:5 207:14 ACAEP 124:13 access 210:22 accommodating 9:13 accompanying 211:5 account 9:20 32:10 56:11,15 57:3,8 73:25 74:2,7 76:17 116:8 212:12 accounts 29:14,23 198:5 208:3 accurate 138:11,19 act 68:17 69:16,23 155:5 155:9 161:12 167:8,19 168:5 acted 127:25 128:3 acting 52:14,20 68:21 126:7,11,13 action 13:15 26:9 actual 18:21 80:25 89:20 162:23 176:7 ACU 71:6 add 217:24 added 132:20 194:12,18 additional 21:13 160:17 194:18,19,23 address 15:24,25 16:4,5 16:7,10,21 adhere 10:14 admitted 176:10 ADOABD6A 1:24 advance 84:10 advice 178:9,12,19 180:12,18 183:11</p>	<p>184:15 194:4 223:16 advised 128:23 advisement 224:25 225:6 affix 144:25 affixed 109:12 afield 133:22 afternoon 124:4 against- 1:6,9 agency 177:22,23 agent 52:15,20 126:8,12 126:14 128:2,3 161:22 174:23 175:7,24 176:11,15,22 177:15 ago 19:21 20:4,17 21:9 23:15,19 24:17 25:6,9 34:13 35:14,15 39:5 45:8 46:4 109:21 159:17 213:2 agree 52:8,21 53:10 65:25 66:13 68:6 72:8 123:5 146:15 149:14 151:22 154:25 164:17 165:2 176:7 agreed 12:6 30:13,22 50:14,17 76:9 117:3 121:11,13,18 133:17 135:13 149:9 207:23 agreement 5:10,17,20 18:11 33:8 37:12 47:4 50:8 54:3,6,14,19,23 54:25 55:8,19 67:4 68:5,6 72:9 93:14 95:2 95:5,23 96:15 97:18 97:21 99:9,13,16,19 99:24 100:18 101:7,10 101:21 102:2,4,7,8 105:18,21 106:6,13,19 106:23 107:15,21,22 107:25 108:2,8,14,17 108:21 109:10,13,25 110:18 111:9,10,12,19 111:25 112:4,7,9 113:6,12,13 114:6,15 119:12 121:6,13,19,23 122:4,10,19 125:13 128:22 129:6 133:6 137:25 138:12,18,19 138:21 139:9,12,16,18 139:19 140:11,25 141:2 143:7 145:23 146:21 147:6,25 148:8 148:14,22,24 149:16 150:12,17 155:20 161:9 162:11,24 164:3 164:7 169:24 170:9 171:4 174:5,13,25 175:19,24 176:6,16,18 178:8 199:13,18 202:7 213:13,17,22 218:7,16 218:18 220:6,11 222:8 222:18,21 223:9 agreements 107:7,10 130:6 ahead 18:6 42:19 123:16 140:7 150:24 156:3,6 159:7 171:6,7 184:12 192:13,15 195:2 203:4</p>	<p>204:9 allegations 86:6 allow 189:7 202:25 allowed 161:4 alterego 9:19 amazing 110:16 American 210:13 amount 119:17,19 123:14 163:8,18 annually 123:11 answer 17:25 18:4,6 20:23 24:20 27:6 34:16,22 41:6 57:9 62:9,9 64:19 65:3 67:11,23,24 68:9 70:20 76:20 80:8,18 80:22 81:8,10 82:19 92:6 94:19 98:24 99:6 102:5 103:14,17 104:15,16,23 112:21 112:24,24,25 113:9 114:8 117:18 122:20 125:7 8 128:20 129:24 131:16,18,19 140:20 141:11 144:16 145:10 145:16 146:3 148:4,5 153:22 157:25 158:4,7 158:10,14,17,20 174:18 175:12 177:25 178:3,5 179:23 181:23 182:3,6,7,10 183:2,20 186:3,21 187:5,7,9,11 187:14 191:13 192:2,5 201:24 202:10 206:5,6 207:18 208:22 210:18 212:11 213:20 221:6,8 221:11 answered 64:17 67:20 68:13 69:4,10 70:13 71:17 73:6 79:16 98:19 105:22 114:7,9 119:6 121:7 135:21 138:23,25 143:2,21 159:24 167:23 180:15 183:6,25 185:10 210:19 212:20 answering 12:13 69:8 173:4,6,11,16 193:24 answers 185:19 226:13 anti-CCP 156:12 antique 75:2 anybody 181:20,24 anyone's 67:2 124:24 141:7,13 143:4 apart 42:2 43:17 appearances 4:2 7:11 appearing 200:2 appointing 166:19 approach 115:10,14 116:3,7 approached 206:9 appropriate 61:7 76:6 117:13 130:4,5 approval 149:8 171:12 approved 170:9 APR 123:2 Archive 196:21 areas 8:6</p>	<p>argue 9:19 arguing 67:10,14 Argumentative 68:14 159:24 183:6 arrested 32:23 asked 10:13 36:20,21 37:8 43:18 44:2,5,8 46:17 52:6 64:17,18 67:20 68:8,12 71:17 73:5 83:13,14 89:11 92:24 94:5,21 95:25 96:20,23,24 97:3 98:18 104:21 105:22 106:21 107:2,5 112:9 114:7,9 119:6 121:7 122:9 123:13 128:22 131:22 133:8 135:21 138:22,24 142:25 143:20 151:5 154:18 157:22 159:24 167:23 170:18 180:15 182:7 183:5,10,25 185:9 192:7 207:7 210:19 212:4,8,19 219:6 asking 9:6 20:19 30:3 31:22 33:23 39:14 40:7 42:10,12 43:3 47:23 49:8 51:22 53:6 53:8 54:17 58:13 59:10,24 61:16,18,18 61:22 68:20 70:16 75:23,24 76:2 78:9 88:14 90:8 94:25 98:25 100:15,16 101:25 103:10 104:15 108:3 110:10 115:21 118:25 119:3,8 122:5 122:14 125:20 132:15 132:16,18,19 137:20 138:15 142:17 153:7 153:10 154:24 157:19 163:14 164:23 166:9 172:20 175:6 182:20 185:16 189:25 190:2 194:13 196:3 206:20 211:25 216:11 218:9 218:10 aspect 10:15 asset 77:4 assets 30:3 32:15 74:2,5 196:15,18 197:20 198:4,9,21 199:2 201:3 202:4 203:10,21 204:14,18,21 206:25 207:4 209:22 223:23 assume 10:5 102:22 132:13 Assumes 66:16 211:3 assuming 10:7 Atkinson-Baker 1:21 13:12 14:12 attached 200:13 attempt 211:12,18 attended 88:13 184:20 184:21 attorney 5:15 13:16 15:14 18:18,23 19:7 27:12 39:21,25 40:7</p>	<p>41:6,10,16,21 42:9 43:7,17 51:8,13 69:22 70:3,9 80:21,24 104:21 143:25 144:3 144:14,20 146:6,9 147:3,5,10,12,14,17 147:19,23 162:18 178:14 200:15 205:22 206:2 attorneys 3:3,9,16 81:10 81:12 August 144:22 199:8 authority 50:21,24,25 51:2,11 52:2 53:12 64:22 65:11,15 66:5 66:12 67:16 68:17,25 69:16,23 70:4,12,23 71:5,11,16,20 72:25 144:9,24 145:18 146:13,25 147:13,24 148:19 150:12,17 151:10,18 152:3 155:5 155:9,19,21 161:12 166:25 167:19 168:5 170:18 171:9,12,13,14 171:21,23 authorization 67:3 143:24 148:10,14 157:8 177:11 authorize 27:12 66:23 143:18 183:16 authorized 39:17 40:18 40:19 43:9 47:24 49:17 139:21,23 141:22 142:5 143:4,6 143:11,15 146:5 147:5 147:16 149:10 166:23 167:4,8,13 170:10 171:18,19 205:25 224:12 automobiles 32:16 Avenue 2:20 3:4 13:22 Avra 127:12 aware 127:19,20 137:18 149:11 194:6 210:23</p>
				B
				<p>B 5:7 back 7:8 11:3,7 32:20 37:13,18,20,23 42:22 42:24 44:11 47:5 49:22,24 50:3,9,10 52:7 54:3 56:6,8,10,25 57:17 63:6,23 68:2 72:5,10,12,14,17 73:9 74:8 78:7 92:4,25 93:3 93:5 94:18 105:17 124:8,11 126:17,25 133:14 136:2 137:20 137:22 138:2 149:18 149:20 153:3 155:15 161:9 165:17 169:5,8 190:9,22 196:15 198:4 203:17 205:15 207:5 208:4,5 212:3,6 bad 184:14 188:5 194:6 203:14 badgering 69:7 138:23</p>

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 2

<p>bank 29:13,14,23 32:10 56:11,15 57:2,7 73:25 74:2,7 76:17 116:8 198:5 208:3 212:12</p> <p>barrier 202:24</p> <p>base 189:22</p> <p>based 122:5 129:9 148:8 161:18 169:9 180:10 183:10 194:5</p> <p>basic 29:11 30:4</p> <p>basically 7:19 32:15 63:20</p> <p>basis 53:12 70:17 71:19</p> <p>Bates 5:10,15,17,20 41:10,18 97:21 140:12 162:12,19</p> <p>began 176:24 177:4</p> <p>beginning 145:5 175:3</p> <p>behalf 2:16 8:11,20 9:24 14:9 31:14,19 40:4 44:3 50:22 53:11,13 62:10 64:22 66:2,5 66:13,19 67:6,7,8,17 68:10 69:16,24 70:7 70:23 71:5,12 72:25 78:25 111:13,21 115:3 128:4,13 141:23,24 143:7 144:9 147:25 151:17 155:5,9,20,22 161:12,22 167:20 171:23 172:21 176:23 176:24 177:4,5 178:11 180:7 205:24 221:4,21 221:22</p> <p>Beijing 203:18</p> <p>believe 18:7 22:2 23:18 46:4 64:18,21 66:17 66:18 67:2 71:15,18 77:8 79:7 80:7 92:22 93:23 95:7,8,9 110:25 122:24 123:10 124:20 127:8 128:15 129:2 134:7,8,9 139:25 167:4 171:6,11 177:10 192:19 194:2 198:10,24 206:7 210:16 225:4</p> <p>believed 64:8 171:9 196:16,23</p> <p>believes 8:24 40:17,19 74:4 192:2 197:23</p> <p>best 150:7 192:6 195:24 196:2 206:22</p> <p>better 153:17 192:12</p> <p>beyond 33:14 40:23 60:17 75:19 76:4,6 77:2 85:12 87:20 89:15 90:13 117:14 130:21 131:3,14,21 135:5,11 177:23 198:16 202:6 204:23 206:12 218:21</p> <p>big 154:25 156:12</p> <p>biggest 183:11</p> <p>birthdays 211:7</p> <p>bit 34:19 205:19</p> <p>blank 98:2</p> <p>blood 227:13</p>	<p>blow 188:12 194:5</p> <p>blowed 187:22 188:4,23 188:24</p> <p>blower 183:8</p> <p>blown 188:13,19</p> <p>borrowed 37:21,25</p> <p>borrower 50:8,9 68:5 72:9,16 95:6 97:19 121:12,17</p> <p>borrowing 208:18</p> <p>Boss 158:10</p> <p>bottom 153:23,23 157:22 181:19 186:14</p> <p>bought 77:24</p> <p>bounds 79:21</p> <p>break 42:2 53:17,18 57:10 59:22 62:15,16 66:8 123:17 124:13 168:14,15 205:2</p> <p>breaks 84:23</p> <p>breathing 81:2</p> <p>brief 13:7 62:24 123:25 168:23 205:8</p> <p>briefly 22:14 46:18</p> <p>bring 49:23 197:24 203:10,20</p> <p>brought 75:18 185:12 190:20</p> <p>build 210:13</p> <p>bunch 102:21</p> <p>business 24:2 25:18,21 32:10,11 54:2 67:3 68:4 74:8 75:8,16 76:3 76:13,19,22 77:6 78:5 79:7,13 94:25 117:20 198:4 209:23</p> <p>buy 76:23 77:6,9</p>	<p style="text-align: center;">C</p> <p>C 3:2 226:3 227:3,3</p> <p>C-H-U-N-G-U-A-N-G 23:5,6</p> <p>California 13:13</p> <p>call 11:13 12:9 33:19,22 38:20 59:4 66:22 87:8 87:9,10 165:5 190:9 217:3 222:15</p> <p>called 23:10 38:20,20,20 38:21,22 45:19 59:19 129:6 140:25 156:21 202:12</p> <p>calling 57:19</p> <p>calls 38:25 59:5,8 60:5 80:19 176:2 177:19</p> <p>Calm 159:25</p> <p>campaign 208:10</p> <p>capacity 9:7 16:17,18 33:5,24 66:25 90:9 110:3 221:16</p> <p>capital 103:13 104:23 105:13</p> <p>car 32:17 74:23 76:24</p> <p>care 77:5 135:17</p> <p>careful 97:16 106:15</p> <p>carefully 19:15 106:17</p> <p>cars 32:14,15,16 74:20 74:25 75:2,4,8,13 76:21,23 77:6,7,9,11</p>	<p>77:13,15,18,19,23,24</p> <p>carve 8:4 219:4</p> <p>case 1:6 7:4 13:24 16:14 16:25 17:2 27:13,15 27:18 28:11,24 34:8 53:25 54:16 61:6 77:4 83:12,14,17,25 84:25 85:24 86:6 87:12,20 88:7 93:17 113:17 120:22 139:9,13,16,20 162:21 172:22 184:21 195:7 214:21 215:2 222:9 224:7,15,17</p> <p>cases 12:11</p> <p>caught 59:11</p> <p>cause 196:17 197:20</p> <p>caution 100:3</p> <p>CCB 155:2</p> <p>CCP 32:20 74:4 203:25 218:8,15</p> <p>certain 12:13 91:5,15</p> <p>certify 226:9 227:7,12</p> <p>cetera 203:10</p> <p>chance 104:18</p> <p>change 119:19 122:16 128:24 207:15</p> <p>changing 190:18</p> <p>characterize 50:12 164:16</p> <p>characterized 34:5</p> <p>charge 90:12</p> <p>chase 117:15 126:22</p> <p>chased 36:24 37:23 38:6 38:8,8,10,11,12,14 44:10 59:19</p> <p>chasing 57:24 126:22</p> <p>chat 26:8,16,16,17 32:21</p> <p>cheaper 206:18</p> <p>cheated 27:22 46:17,21 47:4,16,19,22 48:7,13 48:16,16 49:8 72:4,6 73:17</p> <p>check 122:12 128:16 132:11 189:10 220:14 223:21</p> <p>checked 122:11</p> <p>China 26:9 32:22 184:9 194:7 195:20 202:14 202:17 203:11 207:15 221:8</p> <p>Chinese 26:8 32:23 33:2 38:15 47:9 49:18 74:3 116:14,15 117:21 119:10 141:9,18 142:4 149:12,24 156:13 180:5 184:7 191:9 195:5,19 196:13 197:24,25 198:2 203:7 203:9,13 204:3 208:10 219:20</p> <p>Cho 49:4</p> <p>choose 116:10 197:4</p> <p>chose 191:22</p> <p>Chu 138:4</p> <p>Chung 31:5 32:3 34:5,7 34:10,21 35:3,18,23 37:17</p> <p>Chunguang 23:3 44:14</p>	<p>44:19,24 57:18,23 65:17 82:2 83:2 88:5 108:16 113:22 114:20 115:24 125:18 127:17 134:24 136:10,20,25 137:4,15 138:5,6 139:4,8,11 149:5 152:8,10,14 154:8,11 154:14,22 155:4,9,19 155:21 157:20 159:3 160:5,18 161:12 166:7 169:13,19 170:8,16 171:21,22 174:18 205:25</p> <p>Chunguang's 142:14,18 142:22 160:20</p> <p>circumstances 200:4</p> <p>City 3:10 38:6 215:8</p> <p>claim 71:20</p> <p>claimed 185:21</p> <p>claims 42:5 61:23</p> <p>clarity 10:23</p> <p>clear 8:12 9:7 11:5 28:8 63:9 84:8,20 86:10 91:12 96:23 101:14 102:15 119:23 126:5 128:9 144:5 190:14 192:16</p> <p>clearly 23:14,24 24:12 29:24 40:15 44:17 53:23,23 55:21 92:14 111:2 115:8 149:24 152:20,22 159:12 161:17 164:12 165:10 166:4 167:25 168:2 203:5</p> <p>client 80:4,7 189:5,12</p> <p>clients 79:2</p> <p>Cline 3:19 9:15,16 12:24 13:5 14:22,22 16:8,16 18:5 19:19 20:10 21:3 21:10 22:3,11,13 24:23 25:19 27:3 30:10 33:3,13,18 37:4 38:9 39:6,10,22 40:2,9 40:22 42:10,16 43:2 47:8,13,17 48:5,9,14 48:22 50:4,23 51:4,9 51:15 52:4 53:5,14 54:8 56:14,20 57:10 57:21 58:10,12 59:9 59:17 60:15 61:2,13 61:25 64:3,10,17,24 65:9 66:7,15 67:9,18 68:12,23 69:4,10,19 70:2 71:7,13,17 73:4 74:24 75:5,10,17,25 76:25 77:14,20 78:21 79:5,14 80:14 81:5 82:6,15 84:5 85:3,7,11 85:19 86:7 87:14 89:3 90:6,18 91:23 94:7,10 94:17,23 95:4,12,20 96:3 97:9,14 98:4,18 100:2,25 101:12,24 103:18,25 105:22 106:14,24 108:9 110:2 110:20 111:8,14</p>	<p>112:12 113:7,19 114:7 115:4,12 116:4,25 118:6,18 119:6 120:4 121:7 122:23 123:7 125:2 128:18 129:8,16 129:24 130:13,25 131:13,19 132:3 133:13,25 134:14,21 135:4,10,21 136:16 137:11,17 138:9,22 139:6 141:19 142:25 143:14,20 144:5 145:8 145:20,24 146:4,11,16 147:7,21 148:2,5 149:17,22 150:13,18 151:11,19 152:4,15 153:10 154:5 155:6,23 156:20,24 157:16 159:6,23 160:7 161:14 162:8 163:20 164:9,20 165:18 167:22 169:15 170:11,21 171:16,24 173:18,24 174:19 175:9,20,25 176:17 177:7,18 178:6,22 179:15,22 180:15 181:5 182:16,19 183:5 183:25 185:9,23 187:20 188:8,14,20 189:20 191:21 192:14 193:4,24 194:25 195:17 196:19 197:6 197:11,22 198:15 199:3,9,17 200:9,17 200:24 201:4,13 202:5 204:19,23 206:3,11 207:3,16 208:15,19 209:17 210:4,9,19 211:2 212:7,19 213:10 213:23 214:5,22 218:16,25 219:9,16,23 220:4 221:14 222:21 223:25 224:8,24</p> <p>closed 93:2</p> <p>colleague 189:4</p> <p>colleagues 26:10,14</p> <p>collection 58:5 126:15</p> <p>come 11:3 49:22 77:15 105:17 111:4 150:15 179:17 183:24 185:7 186:2 187:8 193:19</p> <p>comfort 80:6</p> <p>comfortable 79:11 80:3</p> <p>coming 209:7</p> <p>commencing 2:21</p> <p>comment 197:10</p> <p>commentary 86:19,22 87:4 197:7</p> <p>commit 50:2</p> <p>committed 50:5</p> <p>common 68:4 118:5,8 194:20,21 195:3,8</p> <p>communicate 219:25 220:8</p> <p>Communicating 40:12</p> <p>communication 59:2 160:17</p> <p>communications 108:2</p>
--	---	---	---	--	---

Atkinson-Baker, Inc.
www.depo.com

Page 3

<p>communist 26:8 32:23 33:2 49:18 74:3 116:14,15 117:21 156:13 180:6 184:8 191:9 195:5 196:13 204:3 208:10 219:20 company 29:18 30:5 73:18 76:24 77:19 79:20,20 107:11,12 111:17,20,21,24 132:23 150:6,7 167:13 170:5,5,23 171:7 196:15 compare 162:22,23 189:11 competitive 206:15,15 206:16 complete 10:17 226:12 completed 10:9 102:7 completely 37:16 203:15 completes 225:14 compliance 79:3 compounded 123:10 compounding 121:15,20 123:2 compounds 121:10 concept 11:17 12:7 concerning 199:14 concluded 225:10 conclusion 176:3 177:20 concur 9:17 conduct 10:20 conducted 80:17 conducting 198:5 confer 84:10,12 222:7 conference 7:8 36:18 109:18,20 confering 219:12 223:2 223:5 confidential 186:25 187:2 confirm 157:8 190:4 confirmative 148:9 confirmed 135:24 136:3 157:7 165:7 167:15 conflate 9:21 confuse 51:18 confused 151:12 176:4 confusing 9:3 56:24 71:18 91:8 136:17 139:17 connection 126:8,14 128:13 considered 209:12 considers 137:5 consult 173:15 consulted 173:4,11 contacted 45:11 contacting 58:6,9,21,24 contained 105:20 content 179:4 context 103:21 104:10 continuation 12:17 26:21 continue 26:25 32:12 37:16 39:8,13 151:21 156:2 192:15,22,23</p>	<p>209:22 CONTINUED 4:2 63:7 124:9 169:6 205:16 continues 174:10 contract 39:18 43:10 47:24 57:3,4 73:8,11 73:22 110:8 131:12 141:22 151:2 152:7 156:6 161:15 162:6 164:19 165:6 169:12 169:21 170:3,16,17,25 171:15,17,19,22 176:11 177:12,17 178:20 194:14 198:18 199:16 200:3 201:9,16 206:10 207:12,23,24 208:18 219:18 220:3 220:15 223:3 contract's 218:14 contracting 165:5 166:3 contracts 150:21 contribute 208:9 conversation 24:19,21 30:19 35:7,23,24 36:11 40:16 44:7,18 44:23 52:11 61:16 63:13 65:19 72:21 81:9,11 82:7 87:19 96:8,9,10,11 109:17 137:4 160:4 173:20 212:16,21,22 conversations 35:3 65:7 80:20 89:13 100:4 136:13,14,20 copies 18:20 copy 55:10 93:13 96:14 98:20,25 99:8 102:18 106:22,23 107:15 108:16,22 112:9 113:5 162:18 185:12 200:12 224:21 corporate 15:11 16:17 17:5,9 33:4 61:3 80:12 81:4,17 82:4 86:19 213:14 Corporation 1:4 2:5,17 3:17 5:22 13:25 43:9 172:7 correct 15:15 16:22 17:3 17:6,10,11,13 18:2 20:13 21:2,7 23:4 24:3 24:4,6,7 26:19 27:7 35:21,22 47:14 49:2 55:3,8 57:9 58:2,6,7 58:19 78:11 105:2,8 105:15 112:5 123:12 124:19 125:14,15 126:10 136:11 142:23 144:8,11 146:23 147:8 152:11 153:22 158:24 158:25 162:9 163:6,16 163:21 167:16 169:14 170:12 172:24 174:22 176:20 178:15 179:6 179:13,14 183:2 192:2 194:12 203:24 208:6 209:20 211:11,23 215:7,12 216:2,4</p>	<p>217:16 218:11 221:2 221:21 222:11 223:8 223:19 226:14 correction 57:2 correctly 103:24 104:6 113:2 158:21 170:7 182:11 187:15 221:12 correspondence 107:22 corrupt 182:9 corrupted 47:9 74:4 119:9 149:12,25 180:5 195:4 197:24 203:7,9 cost 209:24 coterminous 8:4 coughing 149:18 counsel 4:3 6:6 14:13,14 14:19,23 15:3,6 16:13 80:17 82:7,8,10,10,19 93:24 98:3 199:22 224:22 counsel's 202:7 count 209:23 counterclaim 1:11 17:2 28:24,25 country 214:4 COUNTY 226:7 couple 23:15,19,21 24:16 25:9 27:5 35:14 35:15 38:23 59:6 109:21 120:16 121:2,8 162:2 course 31:25 39:3 138:12 195:18 196:12 court 1:2,21 2:2,20 7:11 14:11 18:10 30:13 33:19,22 42:21 87:8 91:16 117:9,10,16 177:21 202:14 court's 33:8 76:10 135:12 199:23 cover 12:15 49:24 covered 39:24 76:10 covers 34:19 create 216:8,10,11 created 216:5 credit 115:11,15,16 crimes 203:10 criminal 196:12,13 current 203:6 224:11 custody 217:17,20 cut 216:7</p>	<p>daughter 24:3 78:14 day 8:15 10:16 11:3,17 11:23 109:11 226:22 days 9:12 23:19 121:2,8 162:2 deal 27:24 39:17 40:18 40:20 43:10,19 44:3 51:3,5,11,23 52:3 53:20 64:22 65:12,17 66:5 67:16 70:23 71:5 71:11,16,20 72:25 82:23 89:4 149:6,9,10 149:11 dealership 74:23 dealing 28:10 39:20 40:4 40:10 60:21 December 5:17 108:25 109:2,5,7,14 115:18 115:20 140:11 148:15 148:16,18 155:15 165:12 166:6 172:17 175:16 222:9,10 224:3 decide 116:2,6 190:17 decided 180:8 decipher 9:5 decision 80:15 82:17 declare 7:20 declined 16:20 deeply 170:13 defendant 1:5,11 2:6,18 3:17 5:23 14:3 17:2 130:16 172:8 Defendant-Countercla... 2:19 defendant/counterclaim 3:9 14:4,9 Defendant/Countercla... 14:20 Defendants/Countercl... 1:8 2:9 defenses 86:6 define 49:12 Definitely 120:8 definition 25:20 49:20 Del 13:10 Delaware 3:18 delegate 183:16 deliver 207:23 delivered 217:19 delving 30:17 demand 46:22 132:6,7 132:10 133:3,9 demanding 163:17 demands 132:19 democracy 195:20 denied 130:19 deny 189:8 depo 128:19 deponent 14:6 depose 62:3 deposed 54:17 87:25 deposit 130:10 deposition 1:15 2:15 5:9 9:8,9 11:21 13:20 14:8 17:5,9,13,16,20,22 18:9,13 19:17,20,25 20:2,15,25 21:5,8 22:12 23:17,18,20</p>	<p>26:22 27:2 29:20 30:21 33:4,12 34:11 34:12,17 35:4,5,6,10 35:20 42:16 54:5,15 55:6 61:3 62:22 63:5 74:13 76:11,21 78:3,6 78:10 80:13 81:18,19 83:4,18,20,21,23 84:4 84:10,16,17,23 85:13 85:23 86:21 87:3,6,13 87:17 88:4,19,24 90:5 90:14,25 91:10,22 92:5,15 93:18 98:5 102:10,18 105:4,9 110:13 111:15 112:8 113:5,11,13,16 120:9 120:12,15 123:22 124:7 125:5 128:17 130:5,22 131:15 135:6 140:16 146:14 152:24 153:8 157:12 159:13 159:14,15 160:14,23 161:4,19 162:17 168:20 169:4 172:3 175:10 179:2,5 181:8 181:12 184:20,20,21 186:7,11,17 189:18 199:10,12 202:9 205:6 205:14 212:9 222:3 225:10,15 226:11 depositions 8:18,23 10:2,8,11,17 88:12 191:20 Describe 190:24 described 136:12 DESCRIPTION 5:8,14 6:3 descriptions 192:9 designated 49:17 174:23 175:7 177:9 designee 61:3 213:12 despite 8:23 details 63:20 65:6 78:2 170:2 208:11 224:13 determine 88:2 223:21 develop 210:7 developing 209:15,18 210:2 device 183:12 devised 180:3 216:23 difference 77:21 134:9 different 8:18,22 9:3,12 22:18,20 34:9 111:24 114:4 147:2 185:19 191:19 197:4 205:19 222:8 dinner 46:7,8,9,10,24 48:2,6 52:17,19 53:22 55:16 56:2 63:17 64:16 65:20,23 67:17 70:25 71:10 72:2 111:2,17,18 127:3,4,6 127:6,9 215:3,5 directed 161:3 direction 223:2 directly 40:20 62:4 director 22:16,21 24:5 49:14 82:21 134:22</p>
---	---	--	---	---

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 4

<p>158:13 166:7,13,16 167:12,14 214:2,3,11 224:10,11 director's 138:16 directors 90:13 203:6,6 disagree 181:3 disclosure 119:9 149:11 197:24 203:8 discovery 193:3,6 discrepancy 191:19 discuss 29:8 67:3 148:23 208:7 discussed 94:2 106:5 114:16 127:7 discussion 32:3 49:25 52:15 55:4 57:17 89:22 90:2 92:20 104:12 119:11,24 120:2 121:2 125:23 126:3,6 128:23 discussions 63:25 65:16 82:25 87:12 119:14 126:14 128:8 131:10 137:10 160:9 dismissed 9:21 dispute 177:12 disrupting 86:21 87:3 DISTRICT 1:2,2 2:2,3 Division 169:13 document 5:19,22 41:19 42:11,13 43:4 51:16 69:15,21 70:22 94:2 94:15 98:11,13 101:16 109:12 113:21,25 139:24 140:17,19 148:3 162:10,20 163:2 166:19,24 167:2 172:5 187:4 191:17 200:14 201:21 216:8,16,21,25 217:10 218:21 documentation 112:20 documents 100:24 101:3,6,9,20 102:2 107:12 112:22,23 117:5 168:7,10 188:16 dog 214:12,14 doing 149:14 176:7 190:11 dollar 44:16,21 45:2 46:15 57:24 63:15 64:2 130:9 dollars 37:5,19 46:23 50:3,16 72:11,14 104:22 129:9,12 134:4 135:3 137:5 212:18 Donnelli 3:13 14:19 door 33:16 98:3 double 157:8 draft 101:15,16,17,17 102:6 105:23 163:15 164:6,7,8 drafted 95:7,9 114:3,5,5 drafting 218:20 drafts 101:6,9,20 drawing 88:8 drive 215:13,16,19 216:2 217:18 driver's 217:8,11</p>	<p>Driving 32:17 due 68:24 131:12 duly 15:17 227:9 Dunkin 209:3 duties 40:6 156:14 157:13 158:16</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 3:2,2 4:4 5:2,7 15:16 15:16 226:3,3 227:3,3 E-mail 46:2 100:21 106:3 106:9 124:17 125:9,21 128:25 200:12 E-mails 124:21,23,24 125:18 128:11,17 earlier 26:21,25 65:24 69:23 114:25,25 127:7 205:21 207:8 215:5 earliest 165:12 early 7:19 92:19 175:19 easier 19:10 52:24 222:17 East 16:2 36:9 Easter 218:13 eastern 1:4 2:5,16 3:17 5:18,22 9:9,16 13:25 14:23 15:12 16:24 17:6,10 21:2,6 22:11 22:17,21 24:6 25:25 26:4,18 27:9,11,21,22 27:24 29:9,11,14,17 29:24,25 30:2,15 31:11,14,16,19 32:4,8 32:15 34:6 35:4,13,18 37:13,18,20,21,22,24 40:5,8,17,18 41:18,18 41:22 42:5,7,8,12 43:8 43:18,19,24 44:2,3 46:23 47:23,24,25 48:3,8,10,11,13,15,18 49:8,9,13,20 50:2,10 50:16,22 51:2,12,19 51:22 52:2,14,14,20 53:8,12,19,21 55:14 55:22 56:6,7,9 60:18 60:20 61:4,10,22 62:8 63:14,22,24 64:5,20 64:21 65:12,16 66:2,4 66:13 67:8,16 68:11 68:17 69:16,24 70:8 70:14,24 71:3,6,9,12 71:19 72:15,16,24 73:9,12,20,25 74:4,8 75:16 76:3,12,14 78:4 78:8,14 80:11 81:2,16 81:25 82:13,22 83:3 83:13 86:3 89:20 90:10 94:3,16,21 99:19 106:21 107:6,9 107:14,20,24 108:4 110:5,19 115:10,14 116:2,6,8 118:3,11 119:3 122:18 123:5,9 123:13 125:17 126:7 126:11,13 127:18 128:2,4,13,16 129:13 129:21 130:3,8,23 131:9,25 132:6,9,16</p>	<p>132:21 133:11,23 134:3,15 135:2,9,24 135:25 136:7,8 138:15 140:13 141:23,24 143:5,7,8,17 144:7,9 146:17,22,25 147:6,17 147:25 151:9,14,17 152:3,7,11,13,19 153:6 154:3,11,15,20 155:5,10,20,22 156:5 156:8,11,11,19,23 157:4,5,10,15,24 158:2,5 161:13,22 162:4,19,21 164:13,18 164:24 165:4,14,16 166:2,8,13,21 167:7 167:20 168:5,7 169:12 169:20,21 171:23 172:6,12,22 173:4,8 174:24 175:6,17,23 176:5,10,15,23,24 177:5,6,14,16 178:3 178:11 179:10 180:7 181:10 182:4,14 183:20,22 186:4 189:8 195:11,15,18,21 196:3 196:14,16,23 197:15 197:18,23 198:3,5,8 198:10,13,18,23 200:25 201:8,12,15 202:2 203:8,13,20 204:17 205:23,25 206:9,21,24 207:10,13 208:2,4,17,23 209:6 209:10,14 210:2,6,12 210:23 211:6 212:6,12 212:13 213:11 214:3 214:12 218:6,9,10,12 219:7 221:19,21,22 223:23 224:6,9 Eastern's 49:14,14,15 49:16 53:2,4 56:11,15 57:2,7 173:10 174:10 196:9 203:5 209:21 Eastern-000001 5:21 162:13 Eastern-000004 5:21 162:13 Eastern-000005 5:18 140:12 Eastern-000276 5:15 41:10 Eastern-000278 5:10 97:22 economies 12:8 Ed 215:20 Eddie 14:18 56:25 61:16 66:8 70:2 71:23 80:3 91:8 118:9 122:5 159:11 182:21 185:16 186:3 188:9 edgreim@gravesgarr... 3:12 educate 131:22 EDWARD 3:12 effecting 207:14 efficiency 12:10 efforts 38:17</p>	<p>eight 185:4 Eighth 2:20 13:22 either 11:5 68:17 134:11 152:21 216:13 electronic 98:22 215:11 215:12 emphasized 32:13 employee 13:16 49:14 employer 183:12 enforcement 202:15 engage 195:21 196:4 engaged 131:10 English 23:8,9 37:8 45:15 66:9 95:15,15 142:4 197:12 enter 198:18 199:15 200:3,7 201:8,16 entered 148:21 entering 164:19 entire 120:22 202:14 207:11,11 208:9 entirely 8:23 entities 7:22 8:11,25 9:22,24 12:13 entitled 12:19 13:25 87:15 entity 7:23 8:2 79:12 103:12 116:11 131:3 135:18 164:19 EP 55:14 199:15 200:2,5 equation 161:23 Erin 3:6 8:17,19 11:20 15:3 ESQ 3:6,12,13,19 4:6 establish 7:25 8:2 21:16 130:20 et 203:10 event 63:5 events 160:13 eventually 216:16,21 everybody 33:21 102:22 evidence 66:16 211:3 exact 10:13 60:8 157:23 201:20 exactly 88:3 146:18 EXAMINATION 5:3 15:21 63:7 124:9 169:6 205:16 examined 15:19 example 30:14 65:20 194:22 exchange 125:20 exchanged 125:18 Excuse 19:21 execute 171:18 exhausted 31:2 exhibit 5:8,14 6:3 18:12 18:17,24 19:3 41:9,14 41:16,17 97:20 98:6 99:22 105:19 106:7 137:23 140:10 145:2 145:19,21,24 146:10 146:21,21 147:13 162:10,17,19,24,24 163:4,9,23 164:9,10 172:4,5 185:15 186:6 186:9,17,18 189:18 193:10</p>	<p>exhibits 5:13 6:2,6 145:25 exist 168:10,11 existence 162:5 218:7 218:14 expected 34:14 47:11 50:16 89:9 expecting 47:3,7 expedition 87:18 expend 209:6 explain 17:18 38:13 44:9 44:11 81:12 156:7 203:19 explaining 191:25 express 52:25 expressed 32:9 117:10 150:25 156:10 157:4 167:24 expressing 52:22 53:4 extent 21:16 80:15 125:6 130:15 176:2 212:8 eyes 54:19</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>F 207:21 227:3 F-I-R-M 148:9 face 145:14 fact 9:12 47:15 67:12 128:10 159:2 160:19 173:15 factors 209:13 facts 66:16 207:25 211:3 failed 80:4 failure 130:20 fair 27:5 34:18 66:10 69:3 80:10 142:2 169:19 175:6 fall 45:9 46:3 55:5 56:13 65:20 66:6,13 67:17 68:22 69:17,25 70:25 71:4,21 familiar 60:24 61:11,12 61:23 62:12,13 family 32:21 116:13,23 117:20,24 184:9,17 194:7 195:5 far 75:7,12 103:24 133:21 151:22,23 154:8 feature 121:15 fee 80:5 129:7 189:5 feel 91:25 103:22 feelings 61:19 felt 11:5 figure 79:19 100:6 191:18 file 1:24 28:25 99:24,25 100:10,11,12,17,17 107:25 122:3 189:24 190:2,3,4,16 192:21 192:24 215:11 217:18 filed 28:24 56:18,18 files 108:5 189:13 215:12,18,21 216:2 filling 61:15,17 final 102:18 135:15 finally 30:25 93:13 197:17</p>
--	---	---	---	---

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 5

financial 30:16 75:22 79:23 130:3,7,17 131:2,5 132:17,18,21 132:24 133:12,14 134:5,6,12,16,19,25 135:9,14,17 financially 13:14 financing 206:18 find 88:9 160:16 161:2 179:20 183:3,7 198:19 206:14,15,16,18 fine 11:15 42:14,15 61:21 76:3 151:24 finish 7:22 57:14 75:25 150:23 151:3 184:11 202:19,25 finished 102:8 153:24 179:22 186:23 203:2 204:10 firm 16:12 122:21,24 148:9,9 178:16 189:4 189:5 first 5:24 7:24,25 15:17 17:22 19:17,25 20:2 20:15 29:13,19 35:20 42:6 44:14 54:5,15,18 55:13 64:7,12,16 74:12 78:6,9 83:21 91:9,22 92:4,15 93:20 98:5,10,17 99:9,12,15 99:18 100:7 102:9,10 104:5 105:4,9,18 111:2,15 112:7 113:10 113:13 120:9,12,15 124:25 125:9 129:14 129:22 130:12,24 131:7,12 140:16 146:7 146:20 147:4 152:18 152:23 153:6,8 159:5 159:10,14,15 160:5,11 160:14,23 161:18 162:4 164:2 165:4,25 172:9,14 173:2,8 179:5 181:8,12 182:21 186:10 187:18 189:18 190:25 191:4,24 198:8 198:17 199:7,25 201:6 201:9 205:21 212:9 214:9 220:25 222:2 fishing 87:18,25 five 179:12 184:25 185:7 185:17,18,20,22 186:2 192:11 194:17,19,23 195:3 five-minute 168:15 fleet 77:18 flip 186:22 flow 204:22 focused 12:4 Foley 178:16 190:5 follow 90:4 following 58:4 201:21 follows 15:20 foreigner 91:25 197:5,9 forget 61:19 81:13 169:18 189:4 214:15 forgot 48:23 120:7 122:13 126:21 155:13	156:9 form 18:5 20:10 21:3 22:13 24:23 25:19 27:3 38:9 39:6,23 40:9 40:23 43:3 47:8,13,17 48:5,9,14,22 50:4,23 51:4 52:4 53:5,14 56:14 57:21 58:12 59:9,17 64:3,10,24 65:9 66:7,15 67:9,19 69:19 71:7,13 73:5 74:24 75:10 77:14,20 78:21 79:5,14 81:5 82:15 84:5 85:3,7,11 86:7 90:7,19 91:24 94:17,23 95:4,20 96:3 97:9 99:10 106:24 108:9 110:20 111:8,14 112:12 113:8,19 115:4 115:12 116:4,25 118:6 118:18 120:4 122:23 123:7 129:8,16 132:3 133:25 134:14,21 135:4 136:16 137:11 137:17 139:6 141:19 143:14 147:7,21 148:2 149:22 150:13,18 151:11,20 152:4,15 154:5 155:6,23 156:20 156:24 157:16 159:6 160:7 161:14 162:8 163:20 165:18 167:22 170:11,21 171:16,24 173:18 174:19 175:20 176:17 177:7,18 178:22 179:15 181:5 182:16 185:23 187:20 188:8,14,20 189:20 193:4 194:25 195:17 196:19 197:22 202:5 204:19 207:3,16 208:15,20 209:17 210:4,9 211:2 214:23 219:23 220:5 224:8 format 99:2 forth 51:13 76:5 117:6 227:9 forward 56:25 found 165:8 170:22 182:23 215:21 216:17 216:22 foundation 39:11 60:16 61:14 62:2 87:16 138:10 fourth 71:24 free 103:22 201:2,10 Freeman 7:3,5,6,7,10,14 10:3 11:12,24 13:4 French 28:21 141:3 165:15 174:10 180:23 211:25 friends 26:10 front 18:21 19:4 39:19 41:2 55:10 96:15 163:22 193:7 frozen 29:14,24 32:11,11 56:11,12,15 57:3,8 74:3 76:18 116:9	198:3,6 201:10 203:22 209:22 212:13 Fudens 1:23 2:22 14:12 15:18 22:5,21 full 66:25 fully 52:7 224:12 fund 208:9 funny 145:14 further 128:24 130:16 227:12 <hr/> <p style="text-align: center;">G</p> <hr/> G 15:16 89:14 90:7 118:5 226:3 G-U-O 22:23 gain 35:12,18 83:3 gained 34:21 55:11 90:16 Gare 178:13 GARETT 3:8 Gary 174:12 gather 58:3,5 general 15:6 29:10 30:4 51:6 129:10 generally 47:9 59:12 gentleman 189:6 genuine 94:6,9,11,22 getting 30:25 76:4 191:12 206:25 223:22 give 15:23 16:20 18:19 34:8 41:16 53:12 59:14 80:9 100:19 103:25 143:23 145:5 148:13,19 149:8 151:17 171:12,21 179:10 184:15 185:14 192:17 199:19 200:11 given 7:11 17:4,8 21:12 51:2 52:2 73:12 93:16 101:4 167:19 179:3 180:8 189:2,12 192:11 207:10 226:14 227:11 giving 162:18 166:25 180:22 Glendale 13:12 go 8:16 13:5 18:6,16 23:7 42:19 45:22 57:17 75:7 79:19 102:17 114:12 123:16 137:25 140:7 150:11 150:16,24 151:16,25 152:2 153:3,23 156:3 156:6 159:7 163:22 171:6,7 172:25 174:3 178:6 180:21 183:14 183:19 184:8,12 186:12 189:7 191:10 192:13,15 194:6 195:2 200:16 203:3 204:9 207:5 213:13 goal 49:18 76:11 116:16 151:3 154:25 goals 170:17 goes 36:17 76:6 130:6 going 7:18 10:14,16 11:6 11:16,25 18:15,16,17 18:19 19:6,19 21:10 30:10 33:22 34:3	40:23 41:13,14,15 42:2,4 43:2 56:8 57:11 57:14 62:3 68:15,15 70:19 73:9,13,20 75:17 80:14 82:13,16 86:10 87:14,25 89:10 89:12 90:3 91:12,20 92:24 97:25 102:17 105:17 117:14 119:17 130:13 133:14,21 135:13 137:21 140:15 151:4 153:4 162:5,16 165:15 169:17 183:22 186:16 190:9 192:12 192:24 198:24 200:18 202:23 204:14,17 205:18 219:5,21 Gold 205:23 Golden 3:4 4:3,3 8:20 10:10 15:4,7 16:4,5 27:12 36:15 40:19 41:22 42:8 43:9,18 44:2 51:21 70:5,10,12 146:12,13 147:19 181:25 220:22 221:4,8 221:17 good 13:9 49:22 57:13 113:14 124:3 172:2 goose 117:15 gotten 112:10 grammar 188:5 granted 41:22 42:8 69:16,23 70:4,22 147:12 205:23 GRAVES 3:8 great 8:10 41:7 59:13 127:14 145:7 155:2 158:22 Greim 3:12 5:4 7:2,7,13 7:17 8:24 9:6,18 10:16 10:19 11:4,16 12:2,3 12:22 14:18,18,25 15:13,22 16:13,19 21:19 30:23 33:10,15 34:2 57:13 61:9 62:5 62:14 63:8 69:3,8,12 70:16 75:23 85:15 86:18 87:2 89:17 98:7 100:6 103:23 104:3 112:15 123:16 124:10 131:4 135:22 144:11 145:13,22 146:15,18 164:10,21 168:13 169:7 178:2 191:3 192:7 193:8 197:8,13 197:16 199:6,11,21 200:7,11,19 201:6,19 204:25 205:17 213:18 218:22 219:3 224:18 225:2 Greim's 9:13 Grendi 98:13 99:2,21 101:3 106:6,12,18 112:4 113:16 139:3 181:22 group 28:10 103:13 221:8 GSNY 9:10 11:21	GSNY's 40:6 Guan 191:7 guess 28:19 39:2,2 68:15 79:7,9,10 87:15 95:11,12 122:2,6,7 132:15 148:7 161:21 195:10 guessing 134:13 Guo 1:10 5:15 22:23 23:13,22 24:3,22 25:5 25:9 28:17 30:19 31:4 31:12 32:25 35:25 36:4 41:9,14,15,17 48:25 49:10 63:13 65:4,16 78:5,7,13 82:2 82:25 85:22,23 88:4 92:21 126:2,17,24 127:16,25 128:3,11 129:3 134:24 135:8 136:10,20,25 137:4 143:11 146:10 152:21 152:24 153:6 154:3 157:14 158:20 159:3 159:19 160:4,18 161:10,11,20,24 169:13,20 171:13 173:10,15 174:12,17 174:23 175:7,24 176:11,24 177:4,15 178:9,18 179:14 180:3 180:12,18 181:3,9,21 182:8 183:3,11,13,16 183:17 184:4,25 185:8 187:9,10,19,22,24 188:11,12,19,23 193:20 194:4 195:10 195:14 209:11 210:23 213:25 214:16 216:23 216:24 220:21 221:3 Guo's 78:13 116:23 152:14,16 177:22 179:25 184:21 guy 184:7 194:6 guys 68:4 72:3,8 90:21 171:7 184:14 <hr/> <p style="text-align: center;">H</p> <hr/> H 5:7 H-A-N 23:2 half 121:3 211:22 213:3 Hamilton 3:16 13:22 14:23 Han 23:2,3,7 31:5,9 32:3 32:13,19,21 33:17 34:5,7,10,16,21 35:3 36:5,7,19 44:7 49:4 60:24 61:12 62:3 65:4 65:17 82:2,25 83:10 83:17 84:3,8,10,19,22 88:5 95:14,16,22,25 96:24 108:16 109:11 113:22 114:17,20 115:24 116:12,19,20 117:19 118:4,10 119:7 119:21,24 120:3 121:3 122:8,9 125:18,20 127:17,23 132:13 133:6 134:24 136:10
--	--	---	---	---

Atkinson-Baker, Inc.
www.depo.com

Page 6

<p>136:20,25 137:4,15 142:14,17,22 143:10 143:11 148:12,18,23 150:11,16 151:6,8,25 152:2,6,8,9,10,14,21 154:8,11,14,22 155:4 155:8,18,21 156:14 157:4,8,9,20 159:3 160:4,19,22 161:11,24 166:7,20 167:16,24 168:4 169:13,19 170:8 170:13,16 171:11,12 171:21,22,25 174:12 174:17 175:4 183:15 183:18,19 184:9,16 194:7 205:25 Han's 84:16 138:5,7 139:4,8,11 157:13 hand 18:15,16,22 19:6,7 41:13,15 97:25 98:3 162:16 186:16 227:17 handle 27:13 28:5,11 37:8,16 39:8,13 63:14 63:21,25 64:5,9 65:5 143:15,18 hands 53:25 handwriting 141:18 Hank 23:7,10 32:3 165:11 happen 27:5 34:14 76:23 happened 35:8 39:4 55:5 65:7 77:4 87:7 207:12,24,25 happening 44:9 60:5 happens 87:7 happy 54:11 195:18 202:11 208:8,13 harassing 87:21 hard 55:9 98:20,24 99:8 207:19 hat 191:10 202:13 hats 9:5 head 184:7 202:14,16 hear 28:20 55:13 80:24 103:15 111:16 119:20 121:24 123:15 126:18 145:7 149:18 206:13 206:23 218:11 219:10 heard 23:10 28:20 30:24 44:19,24 46:17 54:21 54:24 70:20 72:3 74:2 74:10 102:10 103:14 104:23 105:4,12 114:16 115:18 116:12 116:18 121:8,21 126:16 132:8 149:24 151:23 153:6 197:3 208:8 hearing 198:8 heart 8:24 held 2:20 9:11 help 27:24 37:16 42:14 64:5 72:2 150:8 175:15 192:18 198:2 202:22 204:17 223:23 helped 84:3 helpful 162:23 helping 32:14 113:9,12</p>	<p>hereinbefore 227:9 hereunto 227:16 high 123:2,5,8,11,11 higher 163:18 hire 208:23 209:3 hired 170:4 210:24 Hoag 178:16 190:5 HODGSON 3:3 hold 10:3 129:24 186:6 190:22 191:11 honest 183:16 Hong 29:14,17 30:2 74:3 76:16 107:12 196:18 197:21 198:11,14,25 201:3,10 202:4 203:18 203:20,23 204:18,22 207:2 208:3 220:2,8 220:11,14,22 221:9,11 223:23 Honor 7:18 8:17 9:15 11:4,20 12:23,25 13:3 honored 199:23 hoped 202:18 Hopefully 72:13 hour 57:12 121:4 hours 10:6 12:16,20 76:8 133:21 165:20 185:4 huge 93:6 hundred 72:19,20 99:4 Hypothetical 207:17</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>I-J-E 191:8 idea 101:15 180:2 Identification 18:14 41:12 97:23 140:14 162:14 172:11 186:19 identified 151:14 164:18 165:5,7,17 175:18 181:10 182:14 identify 8:6 173:3 174:4 180:13,17 182:4 183:21 identities 30:16 identity 75:22 79:23 117:7 130:3,7 135:15 ije 191:7 illegal 149:25 illegally 203:21 imagination 122:6 imagine 73:23 important 60:19 impression 60:5 119:11 126:22 154:24 156:16 167:12 In-House 4:3 inaudible 140:5 inch 71:25 include 30:14 120:23 178:21 included 82:8 192:17 211:7 216:16,21,25 including 39:18,18 48:19 116:13 174:5,13 196:14 198:3 199:13 203:17 independent 30:16</p>	<p>75:21 79:23 82:6 130:2,7 indicate 219:7 indicating 141:18 142:6 individual 16:18 62:11 66:25 individuals 169:10 181:11 182:5,15 183:21 information 8:25 29:11 30:4 34:21 35:12,18 47:10,12 83:3 88:8 89:19 90:16 111:6 159:16,20 161:2 180:10 183:23 188:2 194:5 196:10 197:20 210:11,21 211:6,10 214:9 215:23 216:15 216:17,20,22 217:3,4 217:6,7,12,24 223:22 input 173:22 184:16 inquire 130:16 inquiry 30:11 79:18 117:3 130:21 144:6,8 221:15 instruct 213:20 instructed 80:21 instruction 81:7 integrated 32:23 intend 55:24,24 208:17 intended 55:23 195:11 195:15 218:22 interaction 159:19 interactions 63:15 159:21 interest 50:18,19 52:7 68:3 72:5 73:14 89:11 93:5,7,11 95:7 117:6 121:9,14,19 122:15,25 123:5,11,11,14 interested 13:14 154:19 227:14 interject 125:2 191:21 international 210:11,11 Internet 179:20 180:4,10 182:18 183:4,8 187:23 188:2,4,13,19 194:5 210:20 211:10 215:20 215:22,23 216:8,18,22 217:6,9,15 interpret 43:4 interrogatories 5:24 172:10,14 173:5,6,12 173:16 interrogatory 172:21 173:23 174:20 interrupt 103:19 interrupting 192:3 197:17 introduce 14:14 introduced 14:15 154:3 invest 75:2,4 77:6 investigate 119:9 181:2 210:24 investigation 73:18 109:15 149:12 150:2 170:5 investment 74:11,13,14</p>	<p>74:17,19,21,25 75:8 77:8,16,25 78:18 79:6 investments 75:14 76:5 76:20 77:11,11,13 78:25 investors 219:12,15,17 involved 125:11 127:17 127:21 170:14 173:5 175:4,4 181:25 224:13 involvement 126:3 involves 23:20 81:11 involving 82:18 irrelevant 218:17 issue 7:15 31:13 139:12 139:19 issued 10:4 30:13 issues 64:9 item 174:3 199:7</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>J 174:11 J-E 45:20,22 J-I-A-N 202:13 J-U-M 204:8 jail 196:14 198:11 203:16 January 5:20 19:21 20:2 35:6,11 54:4,24 57:6,7 88:19 91:7 92:9 102:19 111:16 113:10 143:12,12,19 144:25 157:12 158:24 160:5,9 160:11,14 161:9 162:12 163:24 164:3,8 164:21,23 171:3 182:23 193:18 221:24 222:20 223:11,12 224:2,3 jdonnelli@gravesgarr... 3:14 Je 45:20,22 47:11 48:12 60:13,14 89:23 90:16 90:24 91:6,21 92:8 93:10 97:3 109:24 110:11,17 114:21 125:19 126:23 133:9 212:17 213:5,8 222:7 222:10,12 Jennifer 3:13 14:19 JGK 1:6 Joanna 3:19 9:16 14:22 21:24 122:7 190:6 job 155:3 join 154:21 161:19 200:6 judge 7:3,5,5,7,10,14 10:3 11:12,24 13:4 21:12 76:7 79:17 87:9 87:22 129:25 133:16 159:11 161:3 judge's 130:15 July 29:2 Jum 204:7 jump 205:18 Jun 191:6 June 56:16 57:8 justice 72:13 197:25 203:10,17,20</p>	<hr/> <p style="text-align: center;">K</p> <hr/> <p>K 226:3 K-I-N 45:23 Kansas 3:10 Karen 86:16 172:16 keep 18:20 19:3 34:3 67:13 68:15 69:7 91:18,19 92:2 107:15 108:16 151:4 190:11 192:12 200:17 202:23 208:17 keeping 106:22,22 keeps 107:6,9,21 132:16 132:21,24 kids 195:6 Kin 45:22 kind 26:5 29:25 31:9 32:11 37:12 45:8 46:17 47:2,4 58:25 105:19,20 106:10 154:19 155:2 165:11 194:16 208:8 knew 29:19 64:5 170:4,8 182:22 knock 8:8 know 8:5 23:8,12 24:20 26:21,25 27:4,23,23 28:4,12,14,14,17,18 28:22 34:20 35:9 37:15 40:10 42:15 44:11 45:21,24 60:13 62:6,9,12 63:20 65:6 68:3 75:9,13 76:7,12 79:8,13 80:5,25 81:22 81:24 82:3,9,12 84:21 95:3 126:22 97:6,7 106:12,18,20 107:19 108:7 114:3,11,14 115:23 118:7 119:4 122:2,7,16,17 125:6 125:17 128:20 131:20 131:25 132:2,14 133:2 133:5,23 134:8,10,12 135:18,23 138:20 142:12 144:17 145:6,6 145:16 149:15,23 150:9 151:8,13,14 152:2 157:12 158:10 158:11,14,15,17,18 159:8 160:3 161:25 170:3 175:2,12,13 181:10 182:6,14 183:17 185:5,6 186:23 187:11 190:18 191:16 195:6 198:21 201:15 203:17 206:5,20 210:5 213:15 214:8,11,17,19 224:13 225:3 knowledge 8:2,7 42:17 55:11,11,12 74:11 118:25 119:2 159:16 169:11,20 174:4,12 195:24 196:2 known 60:14,22 knows 62:8,11 179:19 180:5 Kong 29:15,17 30:2 74:3 76:16 107:12 196:18</p>
---	--	--	--	---

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 7

<p>197:21 198:12,14,25 201:3,10 202:4 203:18 203:20,23 204:18,22 207:2 208:3 220:2,8 220:11,14,22 221:9,11 223:24</p> <p>KWOK 1:10</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>L 226:3 L-I 204:8 L-I-U-C-H-E-N-G 191:8 labeled 41:18 language 150:5 202:24 212:15 larger 100:23 late 65:8 114:23 166:6 latest 166:5 212:16,21 law 16:12 68:4,6 72:9 94:25 95:5,23 97:18 113:11,13 178:16 189:4 195:20 202:15 lawsuit 27:23 56:9,17,18 92:25 110:9 lawyer 22:2 81:21,23 93:21 103:10 112:20 173:20 188:22 189:11 189:16,23 190:5 192:17 lawyer's 189:10 lawyers 21:22,23 83:7,8 95:7,10 178:21 learn 78:7 154:14,16 160:8 165:14 182:22 201:11 learned 55:18 64:7,12,15 105:12 154:10 159:16 162:4 166:2 198:20 201:9 214:9 leave 11:10,12,25 49:25 led 200:4 leeway 199:20 left 113:16 124:12 legal 15:24,25 80:5 176:2 177:20,25 189:5 203:9 lender 36:25 37:9 50:8 68:5 95:5 97:19 121:12,17 lenders 206:8 let's 13:5 21:17 41:8 62:14,15 66:10 73:23 73:23 83:16 88:15 102:14 103:23 104:8 109:3 123:16 140:7,9 150:25 153:16,18 155:3 167:5 168:14 173:21 174:3 179:8 181:15 190:13,21 191:12,14 193:12,12 200:16,17 204:25 207:6,9,12 212:14 217:3 letter 200:9 Levitt 209:4 Li 204:7 liability 133:12 134:5,16 135:3</p>	<p>Lianchao 49:11 83:10,17 84:19 174:11 175:4 liar 102:11 liars 28:10,20 46:21 72:4 72:11 73:16 137:22 170:6 license 217:8,12 light 111:17 limit 10:16 11:16 88:15 limited 1:4 2:5 5:15 14:2 27:12 39:17,21,24 40:6 41:9,21 43:7,9,10 43:17 51:7 69:22 87:22 89:22 103:13 141:23,25 143:25 144:13,20 147:2,5,14 193:13 201:19 219:17 221:9 222:23 Limited's 5:23 172:7,13 line 21:11 30:11 97:10 103:8 104:19 112:19 117:3 143:13 144:6,7 157:20,23 181:20 182:3,6 186:15 187:5 221:2,15 lines 104:5,16,17 142:10 linguistic 147:8 linguistics 141:10 list 6:4 33:21 90:23 91:9 174:17 180:11 181:4 182:9 183:10,14 184:5 184:18 185:2 186:18 187:7 189:2 190:7,23 191:2,6,7 192:10,19 193:16 194:3,5,9 199:7,24 200:2 202:12 204:16 209:7,11,15 210:2,14 listed 17:20 18:9 192:19 Listen 19:14 listing 19:12 litigating 110:15 litigation 27:25 37:15 39:18 72:10 137:19,21 little 34:19 199:20 205:19 Liucheng 191:7 living 81:2 LLC 1:7 2:8 3:8,9 14:4 14:21 LLC's 5:24 172:9 LLP 3:3,16 13:22 loan 5:10 37:12,13 39:20 40:5,21 42:4,6 43:20 43:22 44:4,9 46:15 47:4,4 51:3,5,12,24 52:3,6,7,12,16,21 53:21 54:2,6,14,19,23 54:25 55:8,14,19,23 56:8 57:25 60:21 63:16 64:2,5,8,9,12,23 65:13,18 66:21,23 67:4 68:2,3 69:25 70:24 71:6,12,21 72:5 73:14 89:6 90:17 92:9 93:2,14 94:2,15 96:14 97:20 99:9,13,15,18 101:7,10,21,25 102:4</p>	<p>105:21 106:4,6,13,19 106:23 107:7,10,15,21 107:22,25 108:2,8,14 108:17,20 109:10,13 110:18 111:9,10,12,19 111:25 112:3,9,21,23 113:6,21 114:5 115:17 116:3,7,23 117:5 118:12,17 119:8,25 120:3,12,15,21,23 121:6,13,18,23 122:4 122:10,19 124:13 125:12,13,19,21 126:3 126:4,8,15,25 127:18 127:19,22 128:2,8,14 128:22 130:6,9,24 131:7,11 133:6,11,16 133:18,19,24 134:4,4 134:16 135:19,25 137:6,16,20,25 138:12 138:17,18,21 206:15 206:16,22,25 207:14 208:4,14 213:5 218:19 218:20 222:24 lobby 36:8,15,16,18 96:10 109:20 Local 174:9 located 221:10 lodge 75:17 117:2 221:14 long 21:9 24:21 36:11,13 39:5 45:8 59:19,23 60:11 92:7 104:12 118:14,19,24 119:5 120:25 121:5 127:2 165:23 169:17 184:13 191:12 199:7 202:20 look 19:11 42:13 54:12 103:3,8 109:3 137:23 142:9 151:2,5 152:5 153:13,16,19 163:8,13 172:2 181:15,17,19 185:14 186:14 190:24 220:24 looked 51:7,14 69:22 147:18 looking 150:5 161:19,20 208:2 loose 104:4 lot 10:21 11:18 24:19 25:2,5 148:17 183:8 215:24 low 50:7 57:16 lower 123:14 lunch 46:6 124:13</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>M 208:23 226:3 M-E-I 22:23 143:10 206:7 M-E-N-G 202:13 M-I-L-E-S 48:24 M-I-N-G 45:23 Main 3:10 mainland 26:9,15 32:22 Maistrello 86:16 87:12 88:15,20 89:14 172:16 majority 8:10 making 140:22 145:14</p>	<p>Man 49:4 manage 32:14 managed 107:13 management 74:13,15 manages 79:4 Mandarin 38:15 60:11 141:9,10 142:9,12 March 56:19 166:12,16 166:22 167:6,9,21 168:6 mark 34:3 marked 5:13 6:2 18:13 18:16 41:11,13,15 97:23 98:5 99:22 140:13,15 162:14,16 172:3,10 186:16,19,25 Market 3:17 marking 98:2 marriage 227:13 match 189:13 materials 210:7 math 123:3 matter 227:15 maximal 194:10 mean 17:17 20:14 27:16 31:20 35:20 36:16 37:9 38:8,8,10,11,12 39:9 40:10 43:21 46:24 47:22,25 48:10 48:10 49:14,16 50:5 50:24 52:17 55:24 58:5,25 59:23 63:17 67:13 69:6 74:14,17 74:18 82:11 84:12,19 94:11,14 95:21 96:16 99:17,25 100:11,13 105:11,23 106:8 107:2 115:16 125:13 138:13 141:6 143:3 144:3 145:21 152:16 155:7 158:6,7 159:8 165:7 193:21 194:21 199:17 207:4,21,24 212:21 214:14,24 217:2,20,25 218:3 means 50:9 72:4 73:22 101:17 149:13 159:15 161:3,23 192:18 207:24 meant 38:13 39:12 48:8 media 62:20 63:4 123:21 124:6 168:19 169:3 205:5,13 225:13 meet 25:24 36:7 84:8 137:19 meeting 25:17,18,21,21 25:22 26:3,7,11 27:10 65:21 68:22 69:17,25 71:4,10,22 73:2 114:23,25 170:23 Mei 22:23 23:13,22 24:22 25:5,9 28:17 30:19 31:4,12 32:25 35:24 36:4 63:13 65:4 65:17 78:13 82:2,25 88:4 92:21 127:19 134:24 135:8 136:10 136:20,25 137:4</p>	<p>143:11 155:11 157:7 159:3 160:4,18,22 161:10 167:15,25 168:4 169:13,20 171:13,25 174:17 183:15 184:9,16 194:7 206:7 213:25 214:16 member 32:21 33:2 memory 19:22 24:18 40:24 56:21,22 159:9 161:18 Meng 203:25 mention 31:5 111:19 115:5 126:16,24 184:17 224:14 mentioned 38:19 44:8 45:5 46:6 47:2 49:10 49:10 52:5 58:18 61:6 66:20 67:25 72:3 91:3 91:19 92:10 93:12 117:19 119:7 127:4 152:6,19 167:25 183:9 183:18 184:13 224:16 mentions 147:19 merits 207:25 met 24:19 25:2,15 36:8 46:4 48:3 83:21 method 143:23 Michael 28:21 174:11 Mike 180:23 Mile's 150:20 miles 1:10 48:23 150:2,5 150:25 170:23 171:6 million 37:3,4,10,13,19 37:20 22 38:18 40:5 44:16,21 45:2 46:15 46:23 50:3,16 56:10 57:24 63:15 64:2 72:11,14 104:22 119:18 130:9 134:4 135:3 137:5,22 211:17 211:22 212:18 mind 91:18,19 92:3 122:16 mine 190:16 Ming 45:22 minute 36:25 103:20,25 129:25 minutes 7:19 36:13 mischaracterizes 67:21 68:13 75:11 79:15 135:5 139:7 148:3 165:19 174:20 177:19 185:24 187:21 202:6 mischaracterizing 51:16 201:14 misdirect 70:6 Missouri 3:10 Missy 205:14 mistake 56:23 misunderstood 161:6 Mm-hmm 22:8 83:6 96:6 103:6 125:22 137:2 151:15 154:17 modifications 121:22 122:4,10,19 modified 18:10 modify 122:6</p>
--	---	--	--	--

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 8

<p>moment 64:4 money 37:25 38:7 50:9 79:3 92:25 93:5 104:13 105:13 129:14 129:18,22 209:6,15,18 210:2,6,12,13 211:15 212:2,5,15 month 23:15,21 27:5 29:6 92:5 93:9 121:10 121:14,20 122:25 123:10 129:7 131:12 148:17 159:17 160:15 163:15,19 165:22,22 165:22 212:24 213:2,2 monthly 121:10 129:10 months 20:4,17 21:9 24:17 25:6,9 35:14,15 55:6 109:21 159:16 160:16 164:11 morning 13:9 move 7:23 19:23 21:18 30:20 33:7,11 63:11 multiple 70:15 114:12 193:14 mutually 121:11,12,17</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N 3:2 5:2 15:16 226:3,3 name 6:4 15:24,25 23:8 23:9,12 43:14 45:21 45:24 58:13 61:5 103:14,16 115:5,7 138:7 139:15,24,25 140:2 141:5,7,8,11,13 141:17,20,21 142:3,4 142:4,7,8,11,11,13,14 142:18,22,24 143:4 150:20 152:12 165:14 179:20 180:3,4,11 181:4 183:18,19 184:6 186:18 187:7,23,24 188:23 189:11 190:7 190:25 191:2,5,6,7 191:16 192:17,19 194:3,4,9 195:4,4 202:12 209:18 217:6 names 179:2,11,13,19 179:25 180:8,14,17,23 180:25 181:4,9 182:24 183:3,7,15,24 184:5 184:25 185:7,11,17,18 185:20,22 186:2,8 187:19,25 188:3,7,10 188:11,18,18,21,25 189:9,14,19,22,23 190:2,4,7,11,21,23 191:17 192:10,25 193:17,19,20,21,22 194:12,18,19,23 195:4 195:22,23 196:6 204:16 208:24,25 209:4,7,12,16 210:3,8 210:10,13,24 211:6 215:10 217:24 223:17 223:22 224:21 narrative 191:12 192:9 narrow 30:12 narrower 20:8,12</p>	<p>native 66:9 197:11 natural 30:24 82:12 203:12 naturally 203:20 nature 76:2,5 necessarily 73:4 105:19 need 16:9,10,14 21:15 27:23 28:11 33:6 41:5 47:5 67:2 68:2,5 104:9 137:20 144:17 145:6 161:2 191:15 197:6 203:19 needs 86:20 87:2 103:19 143:17 negotiate 121:6 165:15 178:7 negotiated 89:4,16 114:15,21 115:3,6 117:12 130:9 131:7 133:6 176:5 negotiating 130:23 174:24 175:23 176:16 176:22,24 177:4,5,16 178:8,11,20 223:3 negotiation 41:25 42:6 118:14,16,24 119:4 125:12 126:4,9 127:18 127:21,23 133:18 164:12 169:11,21 174:5,13 176:7,18 194:13 218:19 220:2 negotiations 63:25 89:6 89:25 117:5 119:19 124:15,16 148:17 175:8 176:12 199:13 199:19 220:15 222:24 negotiator 117:7 never 23:10 102:6 104:23 121:21 182:7,8 183:20 191:13 197:3 219:10 new 1:2,17,17 2:3,20,21 2:23 3:4,5,5 4:3,4,4 8:20 13:22,23 15:4,7 15:19 16:2,2,4,6 25:10 25:11 38:6 41:22 43:9 43:18 44:3 63:11 160:8 205:23 214:18 215:8 226:5 227:6 Nobody's 142:8 Nodding 63:12 non-lawyer 81:15 non-party 3:3 10:25 11:14 nonlawyer 81:24 nonlawyers 22:5 nonresponsive 192:8 Nope 96:19 99:11 148:25 196:7 213:6 normal 32:10 66:18 67:3 74:8 79:6,13 94:25,25 119:11 198:4 209:23 normally 107:18 North 3:17 notarized 172:17 Notary 2:23 15:18 226:24 227:6 notes 190:14,15</p>	<p>notice 5:9 17:12,15,19 18:9,12 98:4 121:9 125:5 128:19 175:11 199:10,12,17 notwithstanding 191:23 November 165:11,12,17 166:3,5,6,6 175:19 number 13:24 18:21 62:21 63:4 98:6 123:21 124:6 145:2 146:2 168:19 169:3 198:19 199:4 205:13 225:14 numbers 162:20 186:24 211:8,8 217:8,8</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O 226:3 O-R-A-L-L-Y 146:8 oath 142:21 190:10 193:11 226:11 object 8:16 19:19 21:11 30:11 33:13,19 80:14 81:5 82:15 87:14 90:6 97:10 130:14 145:8 214:5 objected 181:22 objection 16:8 18:5 20:10 21:3 22:13 24:23 25:19 27:3 33:3 38:9 39:6,10,22 40:2,9 40:22 43:3 47:8,13,17 48:5,9,14,22 50:4,23 51:4,9,15 52:4 53:5,14 54:8 56:14,20 57:21 58:10,12 59:9,17 60:15 61:13,25 64:3 64:10,24 65:9 66:7,15 67:9,18 68:12 69:19 70:2 71:7,13 73:5 74:24 75:5,10,18 76:25 77:14,20 78:21 79:5,14 84:5 85:3,7,11 85:19 86:7 89:3 90:18 91:23 94:7,10,17,23 95:4,20 96:3 97:9 98:18 106:24 108:9 110:2,20 111:8,14 112:12 113:7,19 114:9 115:4,12 116:4,25 117:2 118:6,18 120:4 122:23 123:7 129:8,16 130:25 131:14 132:3 133:13,25 134:14,21 135:4,10 136:16 137:11,17 138:9,22 139:6 141:19 142:25 143:14,20 147:7,21 148:2 149:22 150:13 150:18 151:11,19 152:4,15 154:5 155:6 155:23 156:20,24 157:16 159:6,23 160:7 161:14 162:8 163:20 165:18 167:22 169:15 170:11,21 171:16,24 173:10,18 174:9,10,19 175:20,25 176:17</p>	<p>177:7,18 178:4,22 179:15 181:5 182:2,16 182:19 183:5 185:9,23 187:20 188:8,14,20 189:20 193:4 194:25 195:17 196:19 197:22 198:15 200:21 202:5 204:19,23 206:3,11 207:3,16 208:15,19 209:17 210:4,9 211:2 212:7,19 213:10 214:22 219:9,23 220:4 221:14 223:25 224:8 objections 5:23 68:24 70:18 172:8,13 objects 173:8 observation 177:22 obstructed 201:23 obtain 74:10 119:2 151:9 196:11 obtained 34:23,24 55:12 90:21 obviously 150:19 occurred 19:9 124:16 136:13 October 1:18 2:22 13:19 62:19 63:3 90:21 92:3 123:19 124:5 159:12 161:3 168:17 169:2 199:24 200:13 205:4 205:11 225:12 226:11 offered 149:4 offhand 54:14 office 13:21 30:2 36:8 officer 158:12 166:20 official 47:10 119:10 149:12,25 158:11 180:6 195:5 197:24 203:7,9,14,15 204:2,4 officials 196:14 offs 102:22 Oh 28:19 29:5 38:19 48:23 52:24 56:2,22 79:24 83:19 95:23 125:16 127:23 211:22 okay 7:10 18:23 19:5,14 20:6,7,24 22:15,18,24 24:21 25:13 26:3,6 27:20 28:6,9 29:16 33:10 34:4,18 35:9 38:16,19 41:8 42:3,5 43:23 44:13 49:3,13 52:13 53:17 61:9 62:5 62:7,16 63:9,11 66:10 66:19 68:8 71:3 72:3 72:18 73:24 75:4 77:10 82:24 84:22 91:25 92:8,11,13 94:18 95:13 96:5 97:17 106:3 109:21 118:14 119:13 122:12 123:9 125:17 134:24 142:21 145:13,15 147:11 148:16 150:24 150:25 151:4,7,12,24 154:2,24 155:15 158:4 158:4,23 159:9 160:24 165:3,3 167:18 168:3</p>	<p>176:22 177:14 186:12 187:17 188:17 192:21 195:25 204:9,12,21 208:7 212:25 215:21 219:25 223:7 225:2 old 102:24 185:14 onboard 151:6 156:6 157:5 Once 113:21 one's 142:11 ones 12:5 91:19 160:19 opened 33:16 operating 76:16 opinion 52:23,25 53:4 75:19 117:9 opponents 8:15 11:11 opportunity 21:13 217:23 oral 148:9,13 orally 125:23,25 144:24 146:5,8 147:2,9,17 order 2:20 10:4,17 18:10 30:13 33:9 76:10 90:21 91:4,16 92:4 130:15 135:12 159:12 199:23 ordered 23:19 26:22 27:2 34:12,17 159:12 original 19:20 162:17 originally 19:17 194:11 outcome 227:14 outcry 196:17,24,25 197:3 outline 49:24 outside 213:16,21,23 overlapping 11:19</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P 3:2,2 p.m 123:19 124:4 168:17 169:2 205:4,11 225:12 packet 180:22 page 19:11 80:23 103:3 103:5 104:9,11,19 109:4,4 112:16 138:3 138:4 141:18 149:13 152:25 153:2,13,16,21 157:17,18 163:9 172:16,25 173:2 181:16,17 186:12 220:24 pages 5:3,8,14 6:3 43:15 153:17,19 172:19 189:7 paid 52:7 68:2 72:5 80:6 93:3 126:16 129:12 137:20 paper 55:10 97:12 99:10 158:2 159:8,9,10 167:3 paragraph 163:11,13 Pardon 139:10 part 39:20 40:5 76:22 100:23 175:5 parties 12:6 13:17 18:11 227:13 party 26:9 32:24 33:2 49:19 74:3 116:15,16</p>
---	---	---	--	--

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 9

<p>117:22 156:13 165:5 166:3 180:6 184:8 191:9 195:5 196:13 204:3 208:10 219:20 pass 18:17 200:14 passport 211:8 paste 216:7 pause 104:8 paused 202:20 pay 37:13,18,20,22 44:10 47:5 50:3,9,10 50:16 54:3 56:6,8 72:9 72:16 73:9 80:4 136:2 208:3,5 paying 126:25 189:5 payment 44:16,21 45:2 123:6 126:15 129:15 129:23 130:12,24 131:11 132:6,10 163:7 163:13 payments 73:15 89:8 117:6 PDF 216:3,5,9,10,11,17 216:22,25 217:10,18 PDFs 215:22 pen 95:21 pending 85:14 140:18 people 11:8 22:18,20 48:18 49:7,8,9,13,16 49:21 54:3 61:7 88:3 88:10,11 89:18,21 182:9 183:9 188:23 194:10 195:19 197:25 198:3 203:14 213:7 219:19,21 222:25 224:11 Pepper 3:16 13:21 14:22 percent 72:19,20,20 93:9 99:4 121:9,14,19 122:25 123:10 148:7 performance 125:3 period 31:22 117:16 136:2 166:21 167:5,8 175:23 177:3 permitted 12:5 89:5 persecute 26:10 persecuted 116:24 117:21,25 184:17 203:7,14 219:19 persecution 26:14 32:21 33:17 persecutor 202:14 person 22:19 24:10,13 25:9 30:24 38:6 45:10 58:8 61:23 78:4 81:2 82:12 83:2,5 89:20,24 100:19 125:19 132:24 150:11,16 151:9,16,25 152:2,13,18 157:19 161:10,11 167:18 174:4 176:7 194:22 195:11,15 196:13 197:12 202:12,16,17 204:5,6,7 personal 33:24 42:17 52:23,25 53:6 55:10 59:24 61:16 62:11 118:25</p>	<p>personally 33:6 42:15 184:8 persons 173:3 perspective 9:18 177:25 Phillip 189:4 phone 7:3 24:11 38:20 38:24 45:25 59:4,5,8 phonetic 47:21 98:14 physical 217:17,20 physically 55:9 piece 30:18 pile 186:4 189:3,6,12 192:18,21 Ping 47:21 place 13:21 152:14,17 plaintiff 1:8 2:9,19 3:9 5:22 10:10 11:13 14:5 14:10 75:21 135:16 172:6 plaintiffs 10:25 130:17 Plaintiff-Counterclaim 2:18 plaintiff/counterclaim 1:5 2:6 3:16 14:2 plaintiff/counterclaim... 16:25 plan 7:25 196:9 197:18 198:14 201:2,12 202:3 204:13,15 206:24 207:13 218:6 planned 55:25 208:5 218:13 please 14:13 15:24 21:19 41:16 44:8 63:21 65:5 66:8 67:24 103:3 112:16 117:18 145:8 153:13 171:5 172:2 178:21 181:17 186:12 192:11,11,13 192:15 197:14,16 200:7 plus 9:12 POA 39:17 40:25 Podhaskie 4:6 15:5,9,11 15:15 86:23,24 87:5,9 200:6 point 8:13 57:13 102:14 151:13 168:4,7 pointing 191:4 police 184:8 191:10 202:14 political 207:14 portion 42:23 149:19 position 63:22,24 157:23 177:15 possibility 108:3 possible 107:24 108:6 121:25 131:24 132:4 208:16,22 possibly 55:20 64:15,19 132:8 161:23 power 5:15 15:14 27:12 39:21,25 40:6 41:5,9 41:21 42:9 43:7,17 51:8,13,23 69:22 70:3 70:9 143:25 144:3,13 144:20 146:6,9 147:3 147:5,9,12,14,17,19</p>	<p>147:23 205:22 206:2 powerful 202:16,17 PowerPoint 216:14 powers 42:7 PRC 204:2 precise 28:9 31:8 34:15 126:21 150:5 154:23 155:13 156:9 160:10 162:3 167:11 175:2 precisely 37:11 46:16 68:7 72:19 predates 146:10 predecessor 186:15 prefer 50:14 prep 33:12 preparation 22:6,12 23:16 34:8,11 86:17 87:17 88:7 102:25 prepare 20:19 21:20 23:20 34:13 84:3 161:4 prepared 17:24 18:3,7 19:17 20:7,12 21:17 159:14 215:15 preparing 140:20 presence 141:3 present 46:11 96:25 97:4 preserve 178:4 President 157:25 pretty 57:11 89:22 previous 188:22 189:3,3 203:5 224:10 previously 5:13 6:2 18:13 41:11 97:22 140:13 162:14 172:10 186:19 190:5 principal 61:23 156:19 156:21,23 157:2,6,9 157:14 158:4,4,19 principle 119:18 print 102:21 216:8 prior 17:4,8 67:21 68:24 93:24 104:21 190:12 Private 195:7 privileged 82:11 probably 8:3 12:12,15 27:23 78:12 80:16 83:20 154:20 222:16 problem 24:16 31:12 proceed 171:18 process 174:21 produce 164:13 224:21 produced 5:13 6:2 162:21 186:4 188:22 193:3,5 215:25 224:23 production 186:24 professional 73:17 79:6 150:6,8 170:4,25 profit 1:4 2:5,17 3:17 5:22 7:4 9:16 13:25 14:23 15:12 16:24 17:6,10 21:2,7 22:11 22:17,21 24:6 26:2,4 26:18 27:9,11,21,22 27:24 29:9,11,14,17 30:2,15 31:14,16,19 32:4,8,15 34:6 35:4,13</p>	<p>35:19 37:18,20,21,24 40:5,8,17,19 41:22 42:5,7,8 43:18,20,24 44:2 46:23 50:3,16 51:12,20 52:2,14 53:21 55:14,23 60:18 60:20 61:4,10,22 62:8 65:12,16 66:2,4,13 67:8,16 68:11,17 69:17,24 70:8,15,24 71:3,6,9,19 72:24 73:9 73:13,20,25 75:16 78:5,8,14 80:11 81:2 81:16,25 82:13 83:3 86:3 89:20 90:10 94:3 94:16,22 99:19 106:22 107:6,9,20,24 108:4 110:6,19 116:2,6,8 118:3,12 119:3 123:5 123:9,13 125:17 127:18 128:2,4,16 129:14,22 130:3,8,23 131:10,25 132:6,9,16 133:11,23 134:3,15 135:2,9,24,25 136:7,8 138:15 141:23,24 143:7,8 144:7,10 146:17,22,25 147:6 151:14,17 152:3,7,14 152:19 153:6 154:4,12 154:15,20 155:5,10,20 155:22 156:5,8 157:10 161:13 164:18,24 165:4,14,16 166:2,8 166:13,21 167:7,20 168:5,7 169:12 171:23 172:6,13,22 174:24 175:7,18,23 176:5,10 176:23,25 177:5,6,16 178:11 179:10 180:7 181:10 182:4,14 183:21,22 189:8 195:11,15,21 196:3,15 196:16,23 198:9,10,18 198:23 201:8,12,16 203:21 204:18 205:23 205:25 206:9,21,24 207:10,13 208:17,23 209:6,10,15 210:2,6 210:23 211:6 212:6 213:12 214:3,12 218:6 219:8 221:19,21,22 224:6,9 Profit's 42:12 43:8 44:3 51:22 52:15 63:14,22 63:24 71:12 76:3,13 107:14 126:11,14 128:13 132:21 151:9 152:11 162:4 169:20 176:15 177:14 178:3 197:18 198:13 201:2 202:2 223:23 profitable 74:21 Profits 72:15 83:13 143:5 156:11,11 197:15,23 210:12 212:12 Profits' 52:20 126:8</p>	<p>program 183:9 progress 27:14,18 224:7 224:15,16 project 103:17 109:15 143:16,16,19 154:19 154:21 161:20 181:21 181:25 219:13 pronounce 48:15 proper 69:2 Property 147:25 prosecuted 116:14 prosecutors 198:11 provide 173:22 183:3,12 216:24 provided 179:21 193:22 210:7 public 2:23 15:18 36:17 188:2 196:17,24,25 197:19 210:10,20 217:6 226:24 227:6 publicity 196:17 publicizing 196:10 197:19 pulled 217:8 Purport 94:14 purported 43:19,21 51:12 53:21 60:20 110:18 purports 94:12 purpose 15:10 25:22 26:3,7 149:16 170:10 purposes 80:13 81:17 88:6 174:24 175:8 176:11,16 177:16 180:24 206:9 pursuant 2:19 17:12,15 91:15 pursuing 117:11 151:3 195:20 pursuit 17:17 pushing 93:4 put 41:2 180:11 183:10 193:7 194:3,4,8 198:11 217:9</p>
Q				
<p>Qing 191:6 qualified 73:17 98:24 150:8 170:24 177:24 207:22 que 103:9 quest 79:18 question 7:20 17:7,14 19:14 20:21 21:4 22:14 24:17 25:4,7,23 26:23 28:16 31:4,17 33:11,14 34:9,19 35:10 40:3,25 41:4,6 42:6,20 43:25 44:22 48:4,11 50:11,13 51:6 52:10,13 53:16 57:22 58:22 62:4 64:18 65:14 66:9 67:12,15 67:24 68:9 69:5,9,11 69:13 70:6,14,19 71:8 72:18,22,23 73:10 74:22 77:12 79:2,16 79:24 80:2,19 81:6,13</p>				

Atkinson-Baker, Inc.
www.depo.com

Page 10

<p>81:14 82:16,20 83:15 85:14,16 88:18 90:7 91:12 93:19 94:14,18 94:19,20 96:22 99:3 101:2,8,11,13 102:5 103:9,15 104:13,16 106:15 107:8 109:9,10 110:8 112:19,22,24 113:10,22,23 114:4 115:13 116:5 117:18 117:23 118:2,10,21,23 119:4 121:16 123:4 124:18 125:7 126:23 127:21 128:7 129:3,17 129:20 130:8 131:9,17 134:2,15 135:7 136:18 138:14 139:2 140:18 140:21 141:11 142:7 144:12,16,17,18,19,23 145:10,17 146:20 147:4,22 150:14 151:7 151:24 154:13 158:3,6 158:9,11,12,15,18 160:2,10 161:8 163:12 166:24 169:17 171:20 173:2,7,25 175:21,22 176:4,14 177:2,3 180:16 181:20,24 182:8,20,21 183:24 184:2 185:25 186:3,22 187:3,6,8,10,12,17 188:9,10,17 191:12,14 192:5 193:16,17,25 195:13 196:22 197:14 198:18 199:8,15,25 200:25 201:5,17,25 205:21,24 206:21 207:7,8,20,21 208:21 209:8,14,25 210:15,16 210:17 216:19 221:3,7 221:10 222:25 questioned 39:19 185:4 questioner 157:22 questioning 21:11 97:11 201:22 219:17 222:22 questions 7:22 8:10 9:6 10:13 12:14 18:4 33:24 34:22 36:21 59:21 61:8 63:10 86:2 86:5 87:16,23 89:11 103:11 110:11 113:24 117:4,13 145:4 146:11 177:10 182:21 201:7 221:16 225:7 quick-sided 79:18 quickly 8:5 118:20 Quiet 118:19 quite 53:15 126:5 127:2 184:13 207:20 quote 28:9 37:11 79:20 130:14 154:24 156:18 165:24 quotes 31:8 quoting 181:12</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 3:2 227:3 raise 129:14,22 191:22</p>	<p>raised 129:17 192:3 ran 185:5 reach 45:25 reached 119:7 reaction 197:19 read 42:11,18,22,24 43:6 78:23 103:20,24 104:2 104:5,8,9,11,25 113:2 141:10,15 144:15 149:20 152:25 153:20 158:21 163:11 172:18 173:13 174:15 182:11 187:15 221:12,25 226:10 reading 42:20 163:10 ready 127:9 real 94:15 151:16 really 10:11 11:14 19:22 33:6 125:16 138:16 170:5 179:16 reason 52:9 98:8 118:3 171:9,11 194:17 197:10 reasonably 12:3 recall 17:20 24:18 54:4,7 54:13 71:25 102:12 105:3,8 113:4 120:3 154:2 164:2,6,15 178:25 180:22 181:7 184:19,24 185:2,19 211:12,18,25 219:11 220:13,20 222:4 receive 212:13 received 38:24 59:8 129:11 132:9 146:25 receiving 219:22 recess 13:7 62:24 123:25 168:23 205:8 recognition 157:9 recognize 41:19 140:17 140:18 157:5 160:25 172:12 184:25 recognized 164:24 189:2 recognizes 135:19 recollection 168:3 recommend 194:23 reconfirmed 135:24 record 7:9 8:12 13:6 14:25 42:24 62:23 63:6 123:24 124:8 127:13 149:20 168:22 169:5 200:8,16,23,24 205:7,15 225:9,16 226:12,13 227:10 recording 220:17 records 107:6,9,21 132:11,12,17,18,22,25 189:10 190:19 recover 38:17 44:15,20 44:25 refer 92:3 219:19 reference 43:12 referring 37:10 49:9 91:11 100:17 199:4,6 199:9 200:10 reflect 15:2 reflecting 168:8</p>	<p>refund 212:14 regard 89:5 regarding 40:5 43:19 44:4 51:3,12,24 53:20 63:15 64:2,9,22 65:13 65:17 71:12,21 126:15 130:17 202:8 222:22 regardless 217:14 registered 76:14 registration 107:11 rehashing 87:23 reinventing 212:10 rejected 117:17 relate 221:16 related 227:12 relates 144:8 relating 70:24 71:6 relationship 156:8 203:18 relative 13:15 release 203:21 208:3 relevance 130:21 relevant 30:25 124:22 131:8 214:6,8 relied 193:17 rely 191:17 remain 186:25 remark 41:14 remember 21:9 23:14,24 24:12,15,24 28:8 29:5 29:6,7,10,20,21,24 30:8 31:8 32:20 37:11 44:17 45:5 46:16 53:22,23 55:17,20 60:8 61:15 71:2,14 72:6 73:7 78:12,22,24 79:25 83:9,19,20 84:2 84:6,14,18 85:4,8,9,17 85:20,25 86:4,8,10,12 86:14 92:6,14,18 93:15 94:4,24 99:20 99:23 100:12,14,20,22 102:13 106:25 107:3,5 108:12,15,23 110:23 111:15 112:6,7,11 113:18,20 114:2,22 115:8,25 119:15 120:8 120:13 122:14 129:4 137:12 148:6,20 149:3 149:23 150:4 152:20 152:21,23 153:5,11,12 154:9,23 157:11 161:17 164:12 165:10 166:4 167:2,11,25 168:2 172:20 173:19 175:3 177:13 178:7,23 181:6 184:6 185:3 202:11 211:24 216:13 217:5,11,12 220:10,12 220:19 222:19 223:15 224:5 remind 160:18 reminder 20:6 remove 121:14,19 removed 160:12 203:16 rep 80:16 81:4 repaid 52:22 repay 55:23 73:14,20</p>	<p>135:20 206:25 207:14 repayment 40:20 46:22 52:3 60:21 repeat 17:7 20:11 43:2 43:24 65:3 68:23 69:20 71:23 81:6 91:13 131:13 143:3 147:16 192:20 194:3 210:21 repeating 105:6 repetitive 10:21 replied 67:22 208:21 reply 71:23 194:2 210:16 report 27:16 214:24,24 220:21 224:6 reported 1:23 214:20 reporter 2:23 7:12 14:11 14:17 42:21,25 149:21 227:5 REPORTERS 1:21 reporting 27:14 220:21 reports 129:10,10,11 207:23 represent 13:11 66:17 161:21 representation 167:16 representative 15:12 16:24 17:5,9 21:2,6 22:10,16,24 34:6 51:19 60:20 62:6 79:12 80:13 81:15,17 81:25 82:5,14,22 86:20 94:3 110:4,5 134:23 166:21 221:17 221:18 representatives 170:24 represented 150:7 representing 201:4 reputation 80:4 request 9:14 28:7 130:18 225:5 requested 26:11 42:23 112:21 149:19 193:2 require 10:19 11:23 research 5:17,19 129:6 139:9,12,15,19 140:10 140:25 143:16 145:2 145:22 146:21 147:6 147:24 148:8,14,21,24 149:16 150:7,8,9,12 150:17 155:19 161:9 162:11,23 169:23 170:22 171:2 179:3,11 180:24 195:12,16,22 195:23 196:4,6 198:14 198:25 199:12,18 200:5 201:2 202:3 207:10 208:12,24 209:4 218:7,15,23 219:13,18,22 220:2,6 222:8,18 223:8,9 researchers 210:24 researching 210:25 reside 213:9 214:18 residence 16:3 residential 16:7,9,20 respect 68:25 69:24 70:11 128:2 177:23</p>	<p>204:13 218:25 respond 28:6 44:12 128:21 responding 192:14 response 28:2 125:4 173:8 174:8 responses 5:23 172:7 172:13,21 173:23 responsibilities 65:2 156:15 157:13 158:16 responsibility 64:8 responsive 192:8 rest 190:12 208:18 restaurant 25:12 27:9 46:4 127:10,11,15 result 47:3,6 resulting 196:17 results 195:12,16,19 198:25 202:3 218:8,23 219:5,22 RETAINED 6:6 retract 211:12,18 return 124:12 212:14,15 returned 72:14 review 102:24 179:7 181:14 Revision 109:14 RFPs 125:4 right 7:14,17 10:3 11:10 12:21 17:4,25 19:8,18 20:4,9,16,18 21:24 23:5 27:5,6,22 30:6 31:20,21 34:17 35:6 36:14 53:7 54:20,22 56:19 58:13 59:2 62:14 64:13 65:8 66:11,24 67:8 72:10 73:24,24 74:20 76:15 78:20 81:19,20 83:5 87:10 91:9 96:17 100:15 101:18 103:5 104:25 105:7 108:3 109:5,7 118:8,9 119:15 120:18 125:21 125:22 129:7 132:5 144:15,23 146:16,19 146:22 151:8,18,22 152:10 153:4,13,15 154:7 155:16 157:21 160:13 161:16,25 162:7 163:3,5,11,15 163:19 164:5,25 165:8 165:20,24 166:10 167:10 169:8,24 171:4 171:15 173:13 174:15 176:6,12,19 178:14 179:5,17 181:18 187:25 190:6 193:21 199:10 203:18 206:17 209:19 211:22 215:6 215:11,15 218:9,10 220:7,9,25 221:20 223:10,18 road 154:8 Robert 209:3 role 51:21 70:14 126:5 160:20 168:8 room 7:8 15:2 36:18</p>
---	--	---	--	--

Atkinson-Baker, Inc.
www.depo.com

Page 11

<p>109:18,20 roughly 122:14 round 63:10 rule 174:9 195:20 ruled 130:2 rules 218:15 ruling 10:15 running 31:10,13,16,19 32:4 57:16 156:10,16 156:17 167:13 runs 157:5 RUSS 3:3</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 3:2 5:7 S-U-N 204:8 sadly 72:6 sat 88:12 save 179:8 saving 8:13 saw 10:5 95:23 99:9,23 100:7 101:22 102:6,7 111:25 113:12 130:8 167:2 saying 39:7 52:20 53:11 82:22 85:9 86:9,11,12 107:17 147:14 159:13 160:3 189:19,21 193:5 193:6,9 says 41:17 69:6 75:19 103:12 109:4,6,10 112:20 157:23 158:3 173:3,9 174:3 186:15 197:8 scale 12:8 scenario 73:19 scope 11:21 33:14 40:24 60:17 75:20 76:7 77:2 85:12 87:20,22 89:15 90:11,14 110:12 117:13 130:5,22 131:3 131:14,21 133:22 135:6,11 177:9 198:16 202:7,8 204:24 206:4 206:12 213:16,21,24 214:7 218:21,24 219:16 222:22 screen 145:3 seafood 127:14 search 108:13 125:3 128:25,25 searched 108:7,8 124:21 125:9 second 10:4 66:22 87:6 91:10 102:14 128:10 130:24 131:11 153:20 159:10 172:15 173:9 191:5 196:25 200:3 203:3 204:6,7 secretary 107:13,14 section 49:23 Security 208:24 211:8 217:7 see 19:12 37:6 41:5,17 43:14 54:18 55:9 90:3 93:13 98:25 99:4,15 99:18 101:22 103:8,12 104:10 106:5,8 112:3</p>	<p>112:19,24,25 113:11 132:7 138:4,5,6 147:18 157:21 162:25 163:9,14,23 172:15 173:2,7,9 174:6 186:10,15 206:17 220:16,23 seeing 129:11 seek 150:16 200:5 seeks 130:16 seen 54:6,14,25 55:8 98:11,17,21 99:7,12 112:23 113:5 134:11 134:25 135:9 147:23 185:21 187:3 sell 76:23 77:6,9 send 196:12 212:2,5 sense 62:17 sent 128:12 199:8,24 203:16 211:13 sentence 173:9 196:21 200:4 203:3 separate 9:24 10:2,12 43:16 49:23 146:14 separated 11:15 separately 10:20 September 166:12,15,22 167:5,9,20 168:6 set 5:24 20:8,12 30:12 51:13 100:23 172:9,14 227:9,16 seven 10:6 12:16,19 19:16 20:8,13,14,20 76:8 share 195:11,16,18 218:6,14 219:5 sharing 119:8 218:22 shelf 79:20 Shell 170:5 shop 206:22 short 168:14 204:25 show 54:10,11 112:13 122:4 133:11 134:3 140:15 190:19 showed 93:19 97:12 98:14,16 99:2,22 100:13 106:6 showing 190:21 side 11:2 49:16 86:19,22 87:4 156:12 165:6 sign 111:9,18 119:12 139:8,11,14,15,22 141:5,6,8,12,13,22,23 142:22,24 143:4,5,6 143:13 145:18 146:25 147:6,13,24 148:8,14 150:12,17 155:19 156:6 162:6 170:10,18 171:4,17,19,22 177:11 206:2 signature 95:24 96:21 101:18 105:24 109:12 138:5,6,8,12,16,18,25 139:5,9,12,14,21 140:3 141:14,24 142:5 172:17 signatures 163:5 signed 27:11 57:4,5</p>	<p>94:15 95:17,22 96:2 96:25 97:4,6,8,18 108:24 109:13,25 110:18,21 111:5,21 114:13 125:14 141:2 142:24 144:2,14,20,21 146:22 161:9,15 164:3 170:9 171:14 172:16 172:23 signer 111:13 175:18 similar 80:2 204:15 207:8 similarly 18:3 simple 95:14 141:16 simply 34:2 191:16 single 110:7 sit 39:19 sitting 15:2 53:9 70:7 110:3 situation 130:18 135:15 135:18 skepticism 117:10 slide 102:17 Smith 174:12 178:13,18 so-called 170:4 social 25:17,21 211:8 217:7 sole 24:5 214:2 somebody 57:24 58:3,5 68:18 82:3 107:3 108:13 159:20 176:6 206:18 somewhat 185:13 soon 57:11 113:15 sorry 8:19 17:14 31:17 40:18 61:12,19 72:7 74:22 77:12 101:8 128:7 129:17 134:5 149:17 150:22 156:3 171:10 173:2 177:2 180:13 184:12 195:2 197:5 202:23 204:2,11 209:9,25 212:14 214:15 sort 68:18 166:20 sought 105:18 sounds 53:25 61:19 88:2 169:10 213:18 source 44:20,25 sources 147:2 SOUTHERN 1:2 2:3 speak 11:7 22:5,10 23:13,22 24:10 37:7 53:13 83:2 95:14 151:9,17 155:21 speaker 66:9 142:9 speaking 12:12 51:25 53:11 55:7 65:25 67:6 68:10 70:18 79:11 197:12 speaks 38:15 43:5 60:11 special 122:15 219:4 specific 24:17 198:13 201:2,12 202:2 specifically 63:19 65:23 90:13 110:12 198:23 213:12 specifics 198:22</p>	<p>spell 45:15 127:13 spend 209:15,18,24 210:2,6,12,13 spoke 22:22,25 24:15 25:6,8 68:21 78:13 89:21 91:21 120:21 spoken 20:25 21:6,20 88:10 213:4 spot 104:4 spring 3:4 4:3,3 8:20 10:11 15:4,7 16:4,5 27:12 36:15 40:19 41:22 42:8 43:9,18 44:3 51:21 70:5,10 92:19 146:12 147:19 205:23 220:22 221:5,8 221:17 Spring's 70:12 146:13 Springs 181:25 spurious 200:20 squiggly 142:10 ss 226:6 stalk 38:12 stamped 5:10,15,18,20 41:10 97:21 140:12 162:12 stare 145:9 stares 145:11 start 7:18 42:2 151:5 153:18 157:18 160:25 171:2 started 7:16 98:7 152:5 165:11 starting 7:21 starts 157:19 174:8 state 2:23 15:9,19 226:5 227:6 statement 134:12 statements 133:12,15 134:5,6,17,20 135:2,9 States 1:2 2:2 214:2,13 214:16 status 131:2 stay 12:4 steel 202:13 stenotype 2:22 227:5 step 97:7 steps 129:13,21 130:11 stick 167:5 sticker 18:25 19:4 stipulation 145:11 stop 70:18 81:22 86:20 86:23 87:2,5 193:12 197:16 story 191:15 strategic 1:7 2:8 3:9 5:23 7:4 14:3,20 28:23 43:11 73:12,21,23 102:11 104:22 105:5 105:13 109:14 128:4,8 129:15,23 149:6 161:23 163:17 169:12 169:22 172:8,14 179:3 179:10 180:8 186:8 189:15 193:23 195:23 196:5,11 207:6,9,21 210:8,25 211:7,13 212:2 215:10 217:19</p>	<p>223:3 Street 3:10,17 4:4 16:2 36:9 streets 58:4 strike 126:12 169:16 171:10 196:8 structure 213:14 stuff 212:8 subject 79:22 110:9 125:5 128:19 173:9 174:10 177:11 subpoena 16:14 subpoenaed 61:4 Subscribed 226:21 substance 19:24 21:18 30:21 33:7 subtract 217:24,25,25 succeed 73:24 successful 208:12 suddenly 80:5 sue 189:5 sued 56:10 Suen 191:5 suggested 152:13 suggestions 184:5 suing 136:4 Suite 3:5,10,18 summer 29:6 36:5,6 65:8,8 92:17,19 96:12 109:19 114:23 119:25 120:18 136:14 137:9 160:22,22 215:5 Sun 204:7 supplied 184:5 185:21 215:10 support 112:21 supporting 112:23 210:7 suppose 207:6,9 supposed 196:11 199:22 sure 16:9 17:8 20:22 21:15 30:17 35:7 37:14 97:14 98:9 105:25 129:19 137:24 140:22 165:9 166:5 175:9 185:12 192:24 206:4 224:3 SV's 57:4 SVUS 186:24 sworn 14:16 15:17 190:10,12 193:17 226:21 227:9 symbolic 140:6</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 5:7 15:16,16 208:23 226:3 227:3,3 tailored 12:3 take 21:13 49:18 57:10 59:22 62:15,15 74:6 102:14 104:8 116:15 118:24 119:5 121:5 123:17 128:10 129:14 129:22 152:14,16 153:19,20 154:25 168:13,14 172:2 181:15 185:14 191:18 204:25 218:2 224:24</p>
--	--	--	---	---

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 12

<p>225:6 taken 2:16,18 13:8 14:8 62:25 74:4 124:2 168:24 205:9 226:10 talk 24:19 25:2,5 26:13 27:8 34:7,10,16 35:9 36:14 39:3 62:10 66:18,23 78:4 84:13 84:16 85:22 86:17 88:14 89:24 97:15 109:24 120:11,14 128:4 133:17 149:5 160:21 165:11 187:12 188:6 220:10 222:17 talked 25:2 26:17 34:4 35:12,17 82:24 83:17 83:22 84:22,25 85:5 88:3,17,20,25 90:2,24 91:6 92:8 126:24 137:15 161:24 205:22 214:25 talking 23:9 33:16 34:21 43:8 53:23 60:24 66:25 73:18 81:9 84:21 96:16 112:2 124:14 127:8 146:17 161:24 165:21 169:23 179:4 187:25 209:21 213:8 220:18 221:23 222:2,14 223:6,7 224:10,14 targets 119:9 tell 12:2 27:17,20 29:12 29:22 32:2,7,25 37:19 37:24 38:5,16 47:15 48:2,6,12 50:6,13,21 53:19 55:22 59:10,16 68:16,19 71:4,9 75:12 75:15 80:11 81:16 86:24 92:23 93:7,10 96:7 99:4 100:13 108:22,24 109:3,11,16 110:22 113:14 114:20 116:20 119:13 126:20 127:9 135:8 137:7 138:21 155:12 156:14 161:11 188:15 191:15 194:9 202:11 218:13 221:3 telling 27:17 53:9 99:8 137:14,18 138:17 159:2 161:6 189:22 219:11 220:13 term 49:12 95:6 121:20 122:14 123:11 207:11 terminated 73:8,12 terms 105:20 106:4,8 118:17 133:18 148:24 163:8,13 170:3 178:8 194:14 206:15,16,22 Terri 1:23 2:22 14:11 15:18 227:5,21 terrible 61:20 Teske 3:6 8:17,19 9:17 11:20 13:2 15:3 test 19:22 40:24 56:21 56:22 testified 15:20 26:24</p>	<p>54:5 55:5 64:25 65:24 67:5 102:9 112:8 117:8 146:24 154:3 155:18 160:5,11,21 165:13 170:8 186:7 189:17 193:10 209:11 221:24 testify 9:23 18:9 88:16 88:21 89:2 90:15,20 100:3 113:11 135:14 190:3,8 testifying 55:11 105:3,8 113:4 152:23 153:5 157:11 159:21 178:25 181:7 testimony 22:6 24:14 31:2 42:13 51:17 54:9 59:7 67:21 68:14 75:11,20 79:15 84:7,9 84:11,15 85:6 90:9 102:24 112:14 135:5 139:7 142:21 147:11 153:7 154:9 158:23 161:7 165:19,25 169:9 170:19 171:8 175:14 175:17 177:19 180:20 182:13,17 185:24 187:19,21 190:13,18 191:18,24 192:25 193:18 201:14 202:6 211:9 217:15 221:20 226:10,13 227:8,10,11 texts 125:24 128:12,17 128:25 Thank 12:22,24 13:2 20:6 185:16 186:21 theory 117:11 133:15 thing 29:13 57:15 78:19 173:3 194:24 195:3,7 things 30:7 63:10 107:7 107:10 111:11 122:16 132:20 159:4 think 8:3,5,15 11:20 12:16 29:19 30:20 31:2 42:14 51:17 55:18 67:23 75:7 76:6 99:5 107:17 111:24 118:9 123:8 134:13 142:12,19 165:23 192:12 193:8 200:20 208:21 218:5 224:18 thinking 53:24 57:15 third 3:4 19:11 70:20 190:10 Thomas 13:10 thought 118:4 156:3 202:20 203:2 threatened 32:22 116:14 117:21 184:18 219:20 three 34:13 thumb 215:13,15,19,25 217:18 ticked 203:3 time 8:14 10:9,22 13:7 13:19 21:9,13,17 26:20,24 31:22 32:5 35:17 39:5 44:14 45:8 54:18 56:12 59:20,23</p>	<p>60:11 62:18,24 63:2 64:7,16 65:12 70:20 71:24 83:21 92:7 93:20 96:15 98:17 99:9,12 100:7,9 105:18 111:2 112:6,7 120:8,20 122:13 123:18,25 124:4 127:2 131:8 155:13 164:15 164:17,20 165:23 168:16,23,25 176:14 176:23 179:9 184:14 185:5 190:10 191:24 193:13 198:8 200:19 201:9 204:11 205:3,8 205:10 214:10,20,25 222:8 225:11 times 38:23 70:15 116:21,22 117:19,24 120:11,14,16 137:12 137:15 177:15 183:9 185:10 title 158:11 titled 5:19,22 162:11 172:6 today 8:21 11:9 14:6 15:3 18:4,7 20:7,12,20 21:21 22:6,7,12 34:22 40:14 53:9 85:23 87:13 88:16,22 89:2 90:15,20 102:25 113:15 128:17 159:11 161:4 170:19 182:13 182:23 192:25 205:20 212:22 213:8 214:9 221:23 225:4 Today's 13:18 told 27:19,21 28:9 29:13 29:25 30:7,9 31:9,24 36:24 37:7,18,21 44:15 46:18,19,20 50:11,14,15,17 53:9 56:6 57:23 59:19 64:21 65:4 72:16,24 78:19,22 80:24 81:2 81:21,23 82:3,13,21 91:14 96:4 97:16 100:16 108:20 109:13 109:21 110:21 111:3,7 111:9,11,18 112:7 114:18 115:2 116:17 116:22 117:24 118:2 118:10,11 125:23 129:2 134:22,25 136:4 136:6,8,9,19,20,22,23 136:24 137:3,5,7 139:4 147:9 154:20 155:4,8,11,20,24,25 156:5,9,11,18,22 157:3,14 158:20 159:3 159:20 160:19 167:12 167:18 168:4 170:16 170:17,22 171:3,5,13 171:13,19,20,22 184:11,13 202:24 215:20 tool 59:2 top 163:23 181:23</p>	<p>214:12,14 topic 63:11 86:25 90:22 92:2 124:12,22 175:10 191:22 192:4 198:17 199:18 topics 12:4 17:20,25 18:4,8 19:12,13,16 20:8,13,14,15,20 30:12 76:9 88:4,16,21 88:25 90:25 91:2,3,5,7 91:9,15,18,21 92:3 198:16 205:19 total 211:16 touch 16:10 189:22 transcript 10:24 54:10 54:11 103:21 153:14 186:10 220:16,23,25 226:10,12 transfer 216:14 translate 60:10 149:2 treat 134:16 treats 133:24 135:2 trial 16:15 tried 71:25 true 38:16 105:11,11 107:18 138:11,17,19 138:21 170:15 226:12 226:14 227:10 truly 75:7 131:6 trusted 31:10,10 truth 129:2 try 9:5 106:17 175:15 205:19 206:14,21 211:11 trying 9:19 24:25 31:23 38:7 44:15,20,25 51:18 72:10 74:16 88:2,9 100:6 149:11 197:13 198:19 201:11 202:22 Tucker 209:3 turn 112:16 173:21 twice 10:13 twisting 201:18 two 7:22 8:18,22,25 9:4 9:21,24,25 18:19 22:18,20 28:20 34:13 43:14 46:21 65:7 68:16,20 77:23 82:24 83:15 88:3 89:21 91:9 93:9 111:11,12 132:19 137:22 145:25 147:2 165:20,22,22 169:10 182:20 191:19 201:7 202:12 211:13,16,21 211:22 224:11 typed 163:23 types 61:7</p>	<p>24:25 25:4,7,23 28:16 31:23 38:7 39:12 48:17 51:6 52:24 53:15 60:19 74:18 75:6,8 91:4,14 92:2 94:13 99:3,5,7 101:11 101:15 111:23 112:2 117:23 119:23 138:14 150:11,15 160:25 170:7 184:15 187:24 196:21 197:9 198:7 207:19,20 209:8 understanding 32:6 39:14,16 40:7,16 43:8 48:18 50:7 51:23 53:7 54:2 56:7 59:25 60:23 64:4 65:22 77:22 90:22 147:9 156:25 158:7 203:13 unfortunately 59:14 151:7 unfreeze 198:9,20,25 202:3 204:14,17 223:23 unfrozen 74:7 196:18 197:20 207:2 United 1:2 2:2 214:2,12 214:16 upset 28:3 USB 215:14 use 12:20 34:22 50:14 115:7 198:14,24 201:2 202:3 Usually 107:11</p>
V				
<p>V 2:7 15:16 various 209:12 Vecchio 13:10 verifying 172:21 version 98:22 versions 102:3 114:12 193:14 versus 14:3 videographer 13:9,11 62:18 63:2 123:18 124:3 168:16,25 200:22 205:3,10 225:11 videotaped 1:15 2:15 62:21 63:5 123:22 124:6 168:20 169:4 205:14 225:14 view 9:25 68:25 134:19 Virginia 162:5 165:15,21 virtue 15:13 Vision 1:7 2:8 3:9 5:24 14:3,21 28:23 43:11 73:12,23 102:11 104:22 105:5,14 128:5 128:9 129:15,23 149:6 169:22 172:9 179:3,11 180:9 186:8 189:15 193:23 195:23 196:5 196:11 207:7,9,21 210:8,25 211:7,14 212:2 215:11 217:19 223:4</p>				
U				
<p>U.S 37:5 72:11,14 129:9 129:12 Uang 31:5 32:4 34:5,7 34:11,21 35:3,18,24 37:17 ultimately 93:16 163:18 unable 37:22 understand 15:6 16:23</p>				

Atkinson-Baker, Inc.
www.depo.com

Page 13

Vision's 172:14 Vision/Eastern 7:4 voluminous 185:13 volunteer 111:6 <hr/> W <hr/> W 15:16 226:3 W-A-L-L-E-R 128:5 W-A-L-L-O-P 128:6 wait 66:22 145:7 196:25 Waller 28:21 128:5 150:2 150:6,19 174:11 180:23 219:11 wallop 28:21 128:5 150:2,6,19 162:6 165:16 174:11 180:23 180:25 188:21 212:2,4 218:3 220:13,18 Wallop's 141:3 Wang 1:16 2:15 5:4,9,10 5:17,19,22 6:4 9:23 14:7 15:1,23,25 16:1 17:1 18:1,12 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1,21 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1,22 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1,20 98:1,2 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1,23 124:1,7,11 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1,10 141:1 142:1 143:1 144:1 145:1,24 146:1 146:21 147:1,13 148:1 149:1 150:1 151:1 152:1 153:1 154:1 155:1 156:1 157:1,21 158:1 159:1,13,13 160:1 161:1 162:1,10 162:24 163:1,4,9 164:1 165:1 166:1 167:1 168:1,21 169:1	169:5,8 170:1 171:1 172:1,3,5 173:1 174:1 174:11 175:1 176:1 177:1 178:1,5 179:1 179:24 180:1 181:1 182:1 183:1 184:1 185:1 186:1,8,18 187:1 188:1 189:1,17 190:1 191:1 192:1 193:1 194:1 195:1 196:1 197:1 198:1 199:1 200:1 201:1 202:1 203:1 204:1 205:1,6 206:1 207:1 208:1 209:1 210:1 211:1 212:1 213:1 214:1 215:1 216:1 217:1 218:1 219:1 220:1 221:1 222:1 223:1 224:1 225:15 226:9,18 want 10:11,24 11:14 12:9 18:20 19:2,3,6 26:13 27:8 33:20 42:13 48:17 49:6 54:9 54:12 60:10 63:9 75:6 78:23 80:24,25 81:22 81:24 82:4,9,12,19,23 97:14 100:3 101:2,24 102:4,15 104:3,11 106:15 112:13 118:7 122:7 133:23 135:18 145:6 148:7 150:20 152:25 154:7 157:19 161:5 162:22 163:10 164:16 172:18 187:23 191:16 193:14 195:25 198:7 201:15 213:19 wanted 39:8 73:13 80:12 81:3,16 105:16 163:13 207:10 wanting 198:9 wants 12:20 wasn't 56:12,18 103:10 164:3 193:5 216:3 way 11:5,6 19:10 60:13 69:14 77:17 153:4 164:17 173:6 192:12 208:4 211:5 213:16 227:14 ways 68:16 we'll 11:7 33:11 41:25 49:22 53:17,17 63:11 87:8 106:17 124:11 165:5 190:17 191:13 191:18,18 198:2 we're 7:7,9 9:13 30:17 30:25 33:21 41:14 63:6 80:23 97:25 110:15 123:24 133:14 135:13 136:4 146:16 149:11 168:22 169:5 190:9 191:11 198:8,19 199:21 200:19 205:7 205:15,18 212:9 225:9 225:16 we've 18:16 30:24 57:11 99:22 117:12 133:20	135:12 213:7 wearing 9:4 Wednesday 2:21 13:18 62:19 63:3 123:19 124:5 168:17 169:2 205:4,11 225:12 weekly 129:10 welcome 13:4 124:11 169:8 Wengui 1:10 48:25 78:5 78:7 161:11 173:10,16 174:12 Wengui's 24:3 126:2 went 90:11 92:4 102:11 105:5 116:22 118:3,12 119:10 144:15 215:18 weren't 68:10 125:11 whatsoever 77:5 wheels 212:10 WHEREOF 227:16 wherewithal 131:2,5 whistle 183:8,12 187:22 188:4,12,12,19,23,24 194:5 wife 167:17 wild 117:15 William 45:12,13,14,16 45:19,20,24,25 47:11 50:2 52:5,11,16,18,19 53:10,13,20,24 56:4 58:15,16,17,17,20,23 60:13,14,25 61:11,12 61:24 64:16 65:21 66:5,20,22 67:17,25 69:17,25 70:23,25 71:5,10,20 72:3,25 88:25 89:23 90:16,24 91:6,21 92:8 93:10 109:24 111:17,18 114:17,21 116:12,18 116:23 119:8 122:8 125:19 126:16,19,23 127:23 133:7,9 208:8 212:17 213:5,8 222:14 222:15,16 223:4,7,18 224:2,7,14 Wilmington 3:18 wire 105:5 wired 104:13 105:13 wires 211:13,16,19,21 wiring 104:22 wish 19:23 witness 2:16 5:3 8:11,14 9:4 10:7 11:2 12:11 14:16,24 15:16 16:11 16:19 21:14 31:3 33:15 43:4 51:18 67:10 69:4 70:7 82:18 87:19 95:13 97:17 103:19 131:18,22 138:24 146:3 148:4 161:2 177:24 191:3 213:19,20 222:5 224:20 225:8 227:8,11 227:16 witness' 10:22 201:22 witnessed 96:21 witnesses 10:18 87:24	88:12 woman 24:2 Wong 33:6 99:22 140:16 162:19 163:22 173:10 205:14,18 word 38:14 146:7 197:4 200:13 216:8,14 words 60:9,12 72:2,21 77:3 79:21 119:18 126:21 153:6 154:23 156:9 167:11 195:6 196:20 201:20 206:14 206:17 work 73:23 80:3,7 181:20 worked 161:18 173:20 181:9 183:14 working 221:4 worry 28:12 worse 48:15 Wow 60:3 137:12 wrap 205:20 188:4,12,12,19,23,24 wrapped 121:3 write 95:15 139:23 208:13 writing 68:18 105:19,20 106:4,10 121:13,18 144:25 written 132:5,7,9,19 133:3,9 wrong 75:12 164:17 Www.depo.com 1:22 <hr/> X <hr/> X 1:3,12 2:4,9 5:2,7 <hr/> Y <hr/> Y 15:16 Y-U 45:18 Yang 47:21 Yao 191:6 Ye 128:12 yeah 24:13 30:3 32:14 32:17 35:7,8 36:2,5,17 36:22 38:22,22 41:7 46:20,20 48:23 50:20 56:22 59:18 79:24 81:21 93:12 108:25 127:5,24 163:12 176:13 213:2,3 224:16 224:17 year 19:20,21 29:3 35:6 35:8 46:3,4 60:3,6 92:12,13 93:2 136:15 147:20 160:12 207:11 Yiu 191:5 York 1:2,17,17 2:3,20,21 2:24 3:4,5,5 4:3,4,4 8:20 13:23,23 15:4,7 15:19 16:2,2,4,6 25:10 25:11 38:6 41:23 43:10,18 44:3 205:23 214:18 215:8 226:5 227:7 Yu 45:14,17,19 48:12 50:2,13,15,21 52:2,3 52:16 53:10,13,20 55:4,7,16,19,22 58:17	58:17,20,23 60:25 61:11,12,24 64:16 65:21 66:5 67:17 68:21 69:18 70:23,25 71:5,11,16,21 72:25 88:25 97:3,6,7 115:2 121:3 208:13 222:13 223:4 224:7 Yup 146:18 Yvette 1:16 2:15 5:4 14:7 15:1,25 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1,22 63:1 64:1 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1 85:1 86:1 87:1 88:1 89:1 90:1 91:1 92:1 93:1 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 111:1 112:1 113:1 114:1 115:1 116:1 117:1 118:1 119:1 120:1 121:1 122:1 123:1,23 124:1,7 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1 145:1 146:1 147:1 148:1 149:1 150:1 151:1 152:1 153:1 154:1 155:1 156:1 157:1 158:1 159:1,13 160:1 161:1 162:1 163:1 164:1 165:1 166:1 167:1 168:1,21 169:1 169:4 170:1 171:1 172:1 173:1,10 174:1 174:11 175:1 176:1 177:1 178:1 179:1 180:1 181:1 182:1 183:1 184:1 185:1 186:1 187:1 188:1 189:1 190:1 191:1 192:1 193:1 194:1 195:1 196:1 197:1 198:1 199:1 200:1 201:1 202:1 203:1 204:1 205:1,6 206:1
--	---	--	--	--

30(b)(6) Yvette Wang
October 30, 2019

Atkinson-Baker, Inc.
www.depo.com

Page 14

<p>207:1 208:1 209:1 210:1 211:1 212:1 213:1 214:1 215:1 216:1 217:1 218:1 219:1 220:1 221:1 222:1 223:1 224:1 225:15 226:9,18</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>Z-A-C-K 97:13 Z-H-U 202:13 Zach 93:23 Zack 97:12,16 100:5,8 100:13 101:22,23 188:22 190:6 Zack's 99:24 100:10,11 100:12,16</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p>000009 5:18 140:13</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 5:20 37:10,13,20,22 38:18 40:5 56:10 72:11,14 109:4,4 119:18 137:22 162:12 162:20 163:24 164:3,8 164:21,23 172:25 173:2 198:19 199:4,7 199:15 211:17 1:20 123:19 10 20:4,17 21:9 92:5 153:16,18,19,21 159:15,17 160:15,16 182:6 194:11 195:4 10-minute 62:15 10:15 13:20 10065 4:4 16:2 10158 3:5 11:36 62:19 11:51 63:3 1100 3:10 12 6:4 153:13,15 185:15 186:6,9,17,18 189:18 193:10 13 153:19,21,23,23 157:20 199:8 1313 3:17 140 5:17 15 5:4 7:18 179:2,11,12 179:13,25 180:4,8,17 180:22,25 181:4,10 182:14,24 183:3,7,24 184:5,7 187:19,25 188:7,11,18,21,25 189:9,11,14,18,22,23 190:2,4,7,11,21,23 191:17 192:16,25 193:17,20,21,22 195:4 195:22,23 196:6 204:16 208:24 209:4,7 209:12,16 210:3,8,10 210:24 211:6 223:17 224:21 162 4:4 5:19 16:2 36:9 171 186:24 172 5:22</p>	<p>18 5:9 157:23 18-cv-2185 1:6 13:24 186 6:4 19801 3:18</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 5:15,17 41:9,14,16,17 63:4 121:9,14,19 122:25 123:10,22 140:10,16 145:2,19,21 145:24 146:2,10,21,21 147:13 162:24 173:2 2:05 124:4 20 36:13 104:16,17,19 164:11 172:17 220:24 20107 5:17 2011 76:14,17 2017 57:8 108:25 109:2 109:5,7,14 115:19,20 140:11 148:15,16,18 155:15 165:12,17 166:3,6,12,15,22 167:5,9,20 168:6 175:16 222:9,10 224:3 2018 5:20 45:9 46:3 55:5 55:15 56:13,16,19 57:6,7 64:13 65:20 66:6,14 67:17 68:22 69:17,25 70:25 71:4 71:10,21 110:25 111:18 127:2,3 144:22 144:25 155:14 161:10 162:12 163:24 164:8 164:22,23 166:13,16 166:22 167:6,9,21 168:6 172:17 222:20 223:12,13 224:2,4 2019 1:18 2:22 13:19 20:3 29:4 35:11 54:4 54:24 62:20 63:4 65:8 91:7 92:3,9 102:19 110:24 111:16 112:4 123:20 124:5 137:9 160:6 168:18 169:3 200:13 205:5,12 225:13 226:11,22 212 186:12,13,14 213 186:22 22 181:20 23 104:17,19 186:15 2300 3:5 23rd 29:2 250,000 163:8,15 211:20 259 186:24 2700 3:10 276 41:18,18 277 5:16 41:11,18 280 5:10 97:22 288-3376 1:22 28th 90:21 92:3 159:12 161:3 29 5:17 140:11 29th 109:6</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 5:22 124:6 138:4 141:18 168:20 172:4,5</p>	<p>3:25 168:17 3:39 169:2 30 1:18 2:22 5:9 13:19 18:12,17 36:13 62:19 63:3 98:7 123:19 124:5 144:22 168:17 169:2 205:4,11 225:12 226:11 30(b)(6) 2:16 15:16 60:18 81:3 82:5,14,18 85:12 90:10 110:4,5 144:7 213:11 221:21 222:5 30s 98:8 31 5:10 20:2 54:4 97:20 98:2 99:22 102:19 105:19 106:7 137:23 31B 161:2 31st 35:11 33.3 174:9 35 181:17,18,19 36 181:23 3rd 199:24 200:13</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 5:19 162:10,17,19,20 163:4,9,9,23 164:10 169:3 205:5 4:39 205:4 4:56 205:11 40 103:3,5 104:19 41 5:15 164:9 45 112:16,18</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 174:3 194:12 205:13 225:14 5:28 225:12 500,000 211:13,16,21 5100 3:18</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 57:6 103:8 144:25 161:9 171:3 221:2 605 3:4 620 2:20 13:22 64105 3:10 64th 4:4 16:2 36:9 6th 143:12,12,19</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 182:3 750,000 129:7,9,11,15 129:23 130:12 131:11 163:18</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 112:19 182:4 80 148:6 800 1:22 816.2563181 3:11</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 187:5 9:55 2:21 917.941.9698 4:5</p>	<p>96 157:18,22 97 5:10 157:18 158:8 99 72:20</p>
---	--	--	--

30(b)(6) Yvette Wang
October 30, 2019